

BellSouth Telecommunications, Inc.

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Guy M. Hicks General Counsel

December 20, 2002

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VIA HAND DELIVERY

TH REGULATORY AUTHORNY DOCKET ROUM

CONTAINS PROPRIETARY INFORMATION

Hon. Sara Kyle, Chairman Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37238

Re.

BellSouth Telecommunications, Inc.'s Entry Into Long Distance (InterLATA) Service in Tennessee Pursuant to Section 271 of the Telecommunications Act of 1996

Docket No. 97-00309

Dear Chairman Kyle:

In response to Mr. Joe Werner's letter dated December 18, 2002, enclosed are fifteen copies of BellSouth's November 20, 2002 filing with the FCC concerning the single "C" order process. This information is proprietary and is being submitted subject to the terms of the Protective Order entered in this docket.

Mr. Werner also requested any "subsequent" information on the subject. BellSouth has not made any subsequent filings with the FCC with respect to single "C".

Subject to the terms of the Protective Order, copies of the enclosed are being provided to counsel of record, with the exception of Andrew Isar who has requested that he not be provided with proprietary information.

Very truly yours,

Guy M. Hicks

GMH:ch

cc: Andrew Isar, Esquire

CONFIDENTIAL -- Subject to Protective Order

BELLSOUTH

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November 20, 2002

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WRITTEN EX PARTE

Ms Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re: WC Docket No. 02-307 Ex Parte # 1

Dear Ms Dortch:

As the FCC staff reviewing BellSouth's application for authorization to provide interLATA services in Florida and Tennessee has requested, BellSouth is responding in writing to questions from the FCC Staff regarding certain allegations raised by AT&T in its 11/13/02 ex parte. Because Exhibits 6 and 7 attached to this letter contains CLEC specific information, I am requesting confidential treatment of these exhibits subject to the terms of the Protective Order issued in this docket on September 20, 2002. BellSouth will address specific allegations below, but there are three general points that must be made at the outset.

First, AT&T spends a significant portion of its *ex parte* reiterating arguments that it has made previously (both in this application and in the Five-State Application). Rather than respond to all of these recycled allegations, BellSouth will focus this response on the new issues AT&T has raised with respect to Release 11.0 and BellSouth's implementation of the Single C.

Second, many of AT&T's allegations rest on the faulty premise that BellSouth's software releases are "plagued with defects." To the contrary, BellSouth has demonstrated -- both through its own evidence and a report done by QP Management using the external industry standard measurement of defects per

¹ For example, BellSouth has addressed AT&T's criticisms of the quality of Release 10.5, Release 10.6 and the QP Management Report at length in both this application and its Five-State Application and thus will not reiterate those arguments here.

function point -- that BellSouth's software quality is high. AT&T has not submitted any evidence to refute this proof other than to raise unsubstantiated criticisms of the report's methodology, which BellSouth has already refuted in the Stacy Reply Affidavit.

The evidence submitted by BellSouth demonstrates that, despite the increasing complexity of the releases, the percentage of post-implementation defects has declined. When the complexity of BellSouth's software releases is considered (measured in the number of function points), the ratio of defects per function point has decreased steadily over time from .00708 defects/function point in Release 10.3 (January 2002) to 0.00146 defects/function point in Release 10.6 (August 2002). Stacy Reply Affidavit ¶ 81. This function point analysis demonstrates that BellSouth software releases are comparable to "best-in-class" in the industry. Indeed, this Commission concluded as recently as this September that BellSouth's performance in this area is both checklist compliant and improving. See Five-State Order, at ¶¶ 199-200. AT&T has provided no reason for the Commission to depart from that conclusion.

Third, AT&T alleges that BellSouth has not acted "collaboratively" in managing the implementation of software through the CCP as evidenced by its treatment of Release 11.0. The facts, however, demonstrate otherwise. As demonstrated below, BellSouth has adhered both to the letter and spirit of the CCP in addressing the delay of Release 11.0. While AT&T alleges that BellSouth has failed to collaborate by denying the CLECs information about Release 11.0, BellSouth has provided all required information (such as user requirements) and complied with plan deadlines. The information AT&T wants goes beyond what was agreed to in the CCP processes and thus does not reflect a "failure to collaborate." The other information AT&T requests is not delineated in the CCP and thus BellSouth's failure to provide it hardly constitutes a failure to "collaborate." An example of the burdensome requests for information AT&T has made, and then uses as a basis to allege a failure to "collaborate," is attached as Exhibit 1 hereto.

Specific Allegations

1. CLEC notice of Release 11.0 delay.

With respect to the timing of BellSouth's notification to the CLECs about the need to delay Release 11.0, BellSouth complied both with the letter and the spirit of the CCP.² The CCP plan obligates BellSouth to furnish the CLECs with

² The following is a timeline of the events leading up to the decision to delay the release:

^{9/6:} First shipment of Preliminary Code (early stage code) shipped by Telcordia to BellSouth.

^{9/10:} BellSouth internal testing began on Preliminary Code. During the period from 9/10 - 10/4, Telcordia was promising a shipment of Generally Available ("GA") code on 10/4. This shipment of GA code presumably would have fixed the defects BellSouth was seeing in the preliminary

information on the status of a software release 30 days prior to the scheduled release date or, if the release has an extended CAVE soak period, one week prior to the CAVE start date. Section 4.0, Part 2. BellSouth complied with these notice provisions. Specifically, the release was scheduled to be implemented on December 8, and scheduled to go into CAVE on November 11. BellSouth scheduled the conference call with the CLECs to discuss the need to delay the release date on November 4, one week before the CAVE date, and over 30 days before the scheduled production date.

BellSouth's notice to the CCP participants also complied with the sprit of the CCP. In September, BellSouth was following its normal software system. development process. This process called for Telcordia to ship preliminary software, BellSouth to identify defects, and Telcordia to continue its testing and incorporate corrections to the defects identified in its planned "Generally Available" or "GA" release of software. BellSouth's level of concern rose during this period due to the number of defects identified and the number still open. It was during this timeframe that BellSouth became aware that Telcordia would not be able to meet its commitment of "GA" quality software on 10/4. Telcordia's inability to meet this date triggered more intense analysis of the number and nature of defects being identified. BellSouth worked through numerous iterations of software deliveries with Telcordia, but did not obtain the final patches necessary to stabilize the software until 10/25. The delay of software stability impacted the amount of time remaining to adequately test the software. This fact, combined with the number of defects already identified in the release, brought BellSouth to the conclusion that there was no way to hit the original production implementation date of December 8.

What AT&T characterizes as a lack of "collaboration," is really common sense. Had the code fixes shipped by Telcordia on 10/18 and 10/25 cured the defects in

code. Until BellSouth had the GA code in its possession, BellSouth could not accurately predict the quality of the code.

10/4: Telcordia misses the scheduled ship date for the GA code.

10/6: Rather than GA code, Telcordia ships second shipment of preliminary code. Once received, it took BellSouth 5 days to load the code and begin internal testing. Serious problems with testing arose, leading Telcordia to ship a third set of preliminary code on 10/18.

10/18: Third shipment of preliminary code received by BellSouth. The code was loaded into the test environment (a process that requires about 48 hours) and testing began on the items that Telcordia had reported as fixed with this code shipment. This testing continued, some defects were cleared, and some new defects were opened, until the next code shipment on 10/25.

10/25: Telcordia ships "fixes" for the 10/18 code. At this point, the code is sufficiently stable for BellSouth to test it.

11/4: BellSouth officially notifies CLECs of need for delay.

the preliminary code, as they were designed to do, there would have been no need to delay the release. Thus, any warnings given prior to those dates would have been premature. It would have made no sense to alarm the CLECs unnecessarily, and to divert BellSouth resources from managing the release, when there was still a chance that the release would go in successfully. Once it became clear that there was no path forward that would allow Telcordia to clear the existing defects and make the scheduled release date, BellSouth informed the CLECS via CCP, and it did so in a manner that complied with CCP deadlines.

Additionally, it should be noted that AT&T bases its criticism of BellSouth on the implied premise that there would have been some benefit to the CLECs from being involved in the on-going and extensive dialogue between BellSouth and Telcordia from 10/4 to 10/28. AT&T does not, however, provide any specifics to demonstrate what it would have done with this information, or any way in which it was harmed by what is, at most, less than a three-week difference. In short, BellSouth did everything possible to keep the release on schedule, and, at the first point where it became clear that there was no path forward short of delay, BellSouth provided CLECs with the notice required by the CCP.

Another important point is that with Release 11.0, BellSouth has continued to increase its pre-release testing and its visibility into the vendor's development of the software, *i.e.*, BellSouth is receiving information about its vendor's coding and testing earlier than BellSouth did in previous releases. It is precisely the success of this extensive pre-release testing that has allowed BellSouth to identify and mitigate the flaws in the release. Given, however, that the increased visibility that BellSouth had into the development of the release is a relatively recent development, it was not immediately clear to BellSouth whether the defects present in the initial code shipments were out of the ordinary. As the code development progressed, however, it became obvious that the defects were excessive and BellSouth began to look for mitigation strategies as discussed above.

In light of BellSouth's compliance with both the letter and the sprit of the CCP with respect to the notice provided to the CLECs on the delay of Release 11.0, BellSouth anticipates that it would use these same CCP-compliant notification procedures should this situation arise in the future.

2. BellSouth's use of 80% of production capacity for CLEC feature requests.

BellSouth is using 80% of the 2003 release capacity for CLECs. AT&T's calculation of a 48% figure ignores capacity associated with the ELMS6 industry release (which was specifically requested and voted on by the CLECs). Moreover, AT&T ignores infrastructure changes necessary to implement specific CLEC change requests. For example, both EDI pre-ordering and Interactive Agent require that the infrastructure supporting EDI be changed to an M-PLEX

solution to support the functionalities. This change is essential for building these two features as reflected in Reply Exhibit WNS-33. AT&T did not include this change to EDI, which requires 62 units, however, in its calculation. Finally, AT&T failed to include any of the flow through task force requests, some of which were initiated by CLECs.

BellSouth calculated the 80% figure by starting with 2900 units of available capacity. BellSouth subtracted 223 reserve units, and 100 NANC 3.2 industry release units, which should not be assigned to either BellSouth or the CLECs. The calculation is then based on the allocation of remaining 2577 units as follows:

Release	CLEC-Initiated	BellSouth-Initiated
Maintenance Release 12 & 13* Release 14 (ELMS6)	495.5 1567.3	347.5 158.8
Total % of Total Units	2062.8 80%	506.3 20%

Moreover, even if AT&T's methodology is used (taking out the industry release and the maintenance releases) and each item in Release 12 and 13 is assigned to either CLEC-initiated or BellSouth-initiated, the allocation is as follows:

CLEC-Initiated	495.5 units	75.7% of total capacity
BST-Initiated	158.8 units	24.3% of total capacity
Total	654.3 units	100% of total capacity

It is clear that, using either method of calculation, BellSouth will be providing well over the 50% required capacity to the CLECs.

3. Capacity information by OSS component

As BellSouth discussed in its October 31 *ex parte* meeting with Commission Staff, BellSouth will commit to making capacity information available to the CCP in a form similar to that used in Reply Exhibit WNS-33 after each release is scoped.³ Developing this information is an iterative process across multiple

³ Contrary to AT&T's allegation that BellSouth didn't inform the CLECs about reserve capacity, AT&T was involved in discussions concerning reserve capacity on at least two separate occasions. At the September 5, 2002 Releases/Release 13.0 Package Meeting, AT&T questioned BellSouth about the capacity balance for Release 13.0. In response to AT&T's question, and as stated in meeting minutes, BellSouth stated that it reserves 5% of capacity for mandates and 5% for changes in scope/defects – a total of 10% reserve. (See Exhibit 2). At the September 13, 2002 Release Schedule Meeting, AT&T was again involved in discussions

Ms. Marlene H. Dortch November 20, 2002 Page 6 of 6

releases, multiple applications, and multiple activities (See ¶¶ 55-67 of Stacy Reply Affidavit) that occurs while the prioritized change requests are being considered for packaging in a release, and it is thus not possible to furnish the information in advance of the final packaging. Moreover, this information has no practical significance to the CLECs until the release is finalized and scoped.⁴

4. Complexity of Release 11.0

The complexity of a software release can be measured by the number of function points contained in a set of software. The concept of function point counting is explained in some detail in the QP Management Report attached as Exhibit WNS-14 to the Stacy Reply Affidavit. Because the counting of function points generally is not completed until after a release is in production, there are substitute metrics that can be used to approximate the complexity of a release during the testing process. QP Management uses the lines of code metrics with a "gearing factor" (lines of code to function point conversion factor) to estimate the number of function points involved. These substitute metrics are: (1) the lines of code involved in the software release; and (2) the number of test cases developed to test the new release. Using these approximate metrics, the complexity of Release 11.0 is between 1.8 and 2.6 times more complex than Release 10.5 or 10.6.

Release	Lines of Code	<u>Test Cases</u>
10.5	400,000	4,074
10.6	450,000	5,101
11.0	850,000	13,600

AT&T's analysis of the complexity of Release 11.0 has one major flaw - it uses outdated data on the estimated effort required to implement Release 11.0. Specifically, AT&T used earlier sizing data for Release 11.0. As the software development process moves from the initial specifications into coding and testing, the complexity of the development effort often changes. Such is the case for Release 11.0 – the size of the release expanded from initial estimates. BellSouth's preliminary assessment of the issues associated with Release 11.0 reveals the following key contributors to the Release's delay, all of which are associated with increased complexity of the release:

concerning reserve capacity. The meeting minutes state that "[AT&T] asked if the 210 Reserve units was equivalent to 10% of release capacity that BST had previously stated it would put in reserve capacity." (See Exhibit 3). Additionally, in the May 2, 2002 Process Improvement Meeting, BellSouth indicated that maintenance releases are a separate category of releases implemented for the CLECs.

⁴ On page 11 of its *ex parte*, AT&T claims that BellSouth refuses to provide this information for 2004 releases. To the contrary, BellSouth will make this information available when it exists, after the 2004 releases have been scoped. Right now, the requisite information does not even exist.

Ms. Marlene H. Dortch November 20, 2002 Page 7 of 7

- The release size was larger than anticipated at the time it was scoped making it too large to be effectively delivered;
- The XML integration impacted more interfaces and was larger than originally anticipated;
- BellSouth agreed to implement UNE-P to UNE-L bulk ordering, even though there was no industry standard, nor had it been implemented by any other ILEC. As it turned out, the design and development of this feature without a standard was far more complex than originally anticipated.

BellSouth will be performing an in-depth root cause analysis after the release is placed into production and will further analyze the above factors.

5. Information provided to the FCC and to the CCP

The information provided to the FCC and to the CCP differed somewhat in both form and substance based on the needs of the two difference audiences. BellSouth's presentation to the FCC contained some preliminary information about the sizing and progress in testing of Release 11.0, while the CLEC information contained a general description of the issue and then focused on the decision to be made regarding a revised release schedule for 11.0. These differences hardly support the theory of intentional deception that AT&T attempts to promulgate. For comparative purposes, BellSouth is attaching the materials provided to the CLECs on this issue as well as the minutes from the November 4 meeting as Exhibit 4. Moreover, there clearly was no intent on BellSouth's part to hide this information from the CLECs, as all of BellSouth's materials provided to the FCC are publicly available to all the CLECs.

6. Root-cause analysis of Release 11.0

BellSouth's disagreement with AT&T here is simply an issue of timing. As promised, BellSouth provided a preliminary analysis of the Release 11.0 issues to the CCP. Moreover, BellSouth has agreed to conduct a root-cause analysis of the problems with Release 11.0. BellSouth, however, does not want to impede its work toward a successful release by requiring its vendor to stop work on the release to conduct such an analysis at this time. The primary focus of BellSouth and its vendors over the next few weeks is on ensuring that any defects in the software are identified and cleared. Any effort to go backwards in time and produce a root-cause analysis would divert resources dedicated to the primary task — namely installing Release 11.0 with a quality level comparable to previous releases in a timely manner. Once the release is implemented, BellSouth will conduct the requisite root-cause analysis.

7. BellSouth's implementation of the Single C

The partial migration process is vastly different from a full account migration. A partial migration is a multi-step process:

- (1) The existing retail account must be split into 2 or more separate sub-accounts;
- (2) The retail sub-accounts that will remain as retail accounts must be recombined and merged into the remaining retail master account; and
- (3) The retail sub-accounts that will be migrated to UNE-P must be converted.

A partial migration order is not an *account* level conversion; rather, it is a line-level conversion. To convert a line on a multi-line account, a "C" order and an "N" order must be issued. The "C" order removes the line from the multi-line account, and the "N" order adds the line to the CLEC account. It is not possible to issue only a "C" order for partial migrations. BellSouth's legacy systems (primarily CRIS) have a number of inherent limitations on the way accounts, sub-accounts and account structures can be manipulated. Because of the complexities of these relationships, BellSouth has not been able to define a systematic methodology for splitting accounts and re-combining sub-accounts without using "C" orders to disconnect some of the sub-accounts (removing the record from the system without changing the service), and using an "N" order to re-establish the sub-account, properly linked to the primary account. These complexities are the reasons that partial migration orders have not been moved to a single C process.

BellSouth has consistently stated that the "single C" order generation process that BellSouth implemented applied only to migrations from retail to UNE-P for "full accounts." BellSouth covered this issue with the CLECs in the User Requirements Review meeting for Single C on January 15, 2002. As stated in the meeting minutes (attached hereto as Exhibit 5), "Single C allows BellSouth to process the local service request (from a CLEC) by converting an account to UNE-P via the issuance (by BST) of a single C (Change Order). Today, two orders (New and Disconnect Orders) are required to execute the local service request." (Emphasis added).

Additionally, AT&T knew about the use of "C" and "N" orders for partial migrations, as evidenced by its testing in CAVE early in 2002, not just last week as it alleges. AT&T tested both a full and partial migration during the CAVE testing for the single C release. Prior to conducting testing in CAVE, AT&T had the written test scenarios for the Single C. The AT&T test agreement included test scenarios for full migrations (Nos. 11, 12 and 19 – Single "C") and a separate test scenario for partial migrations (No. 21 – "C" and "N"). The AT&T Consumer test agreement included test scenarios for full migrations (Nos. 6,7, 18, and 19 – Single "C") and separate test scenarios for partial migration (Nos. 23 and 24 – "C" and "N"). These agreements are attached as Exhibit 6. There were no separate test scenarios for Single C for partial migrations in CAVE because that

scenario didn't exist. AT&T, via its testing in CAVE, was fully aware that the Single C functionality was designed for full migration orders only.⁵

AT&T has long understood that the single C process replaced only the "D" and "N" order process for account transfers, not the separate "C" and "N" process for partial migrations. For example, in its Comments on the initial Georgia/Louisiana Application, AT&T complained that "BellSouth uses two separate orders to transfer a customer to a CLEC's UNE-P service: a 'D' order to disconnect the customer's BellSouth service, and an 'N' order to migrate the service to the CLEC." AT&T Comments, CC Docket 01-277, at 63 (filed Oct. 19, 2001). AT&T then discusses the adoption of a "Single C" order as a solution to the "problems associated with the separate 'D' and 'N' issues." *Id.* at 64. The contemporaneously filed AT&T Seigler Declaration in that docket also discusses "D" and "N" orders (at ¶¶ 39-54).

The impact of the current partial migration process on the CLECs is minimal to non-existent. From August 1, 2002 through September 30, 2002 only 22 out of 1,457 partial migration service orders had out of service problems related to conversions. This hardly indicates a significant problem even with relatively low partial migration ordering volumes. The small number of partial migration problems does not indicate a significant service order processing problem with the existing "N" and "C" order process.

AT&T also alleged excessive duration time when UNE-P troubles are reported. BellSouth's analysis indicated the following average duration for all UNE-P troubles following migrations for August and September as compared to retail residence and business:

August

September

Retail - 20.21 hrs. CLEC - 13.72 hrs. Retail - 22.20 hrs.

CLEC -7.23 hrs.

This is a combined regional average duration comparison for UNE-P full conversions and partial migrations. These data indicate UNE-P duration is far below the retail analog for maintenance duration. This certainly indicates there is no delay in BellSouth resolving UNE-P maintenance reports.

BellSouth has fully complied with the orders of the GPSC, Louisiana Public Service Commission (LPSC) and the TRA on the single C (the FPSC was silent on this issue). To BellSouth's knowledge, partial migrations were never

⁵ On August 20, 2002, in the CAVE testing environment, AT&T issued a Local Service Request for a UNE-P Partial Migration Order (attached hereto as Exhibit 7). This Local Service Request contains two separate and distinct orders, a 'N' Order and a 'C' Order. This Local Service Request documents that AT&T knew that the Single "C" functionality did not include Partial Migration. See Exhibit 7.

discussed during the deliberations of these commissions, and all of the discussion on this issue focused on the "N" and "D" process used in full account migrations, rather than the "N" and "C" process used in partial migrations. Indeed, the GPSC directed BellSouth to implement "a 'C' order by which N and D orders complete together in sequence to prevent loss of dialtone." GPSC *Order* in Docket 6863-U adopted on October 19, 2001, at 3, attached as Exhibit 8; see Exhibit 9, containing pp. 2-3 of the LPSC Reply Comments filed in CC Docket No. 02-35, filed March 28, 2002. The GPSC found, after BellSouth had implemented the functionality, that "BellSouth implemented the Single C order process as required by the Commission."

8. BellSouth infrastructure changes

BellSouth's implementation of the IDN platform and XML will be transparent to the CLECs and without impact on their ability to submit LSRs.

In accordance with Section 1.1206, I am filing this notice and attached exhibits and request that you please place them in the record of the proceeding identified above. Thank you.

Sincerely,

Kathleen B. Levitz

Attachments

CC:

Michelle Carey
Christine Newcomb
Gregory Cooke
John Minkoff
Janice Myles
Luin Fitch
James Davis-Smith

Sara Kyle Beth Keating

EXHIBIT 1

From: To: bseigler@att.com Control, Change; adsitechnician@yahoo.com; Alan.Flanigan@twtelecom.com; alee@epicus.com; alejandro@amexcomm.com; amanda.hill@Wcom.Com; Annette.Cook@espire.net; Annette.Hardy@accesscomm.com; Arthur, Lynn W; asanjuan@mettel.net; avincent@communitytelephone.com; bbil@4pra.com; bcarias@nightfire.com; Becky.Gorman@accesscomm.com; bellsouth@nightfire.com; beverly.lockwood@btitele.com; beverly.posey@centurytel.com; Bill.York@Wcom.Com; billg@telcordia.com; bmurdo@kmctelecom.com; Bob.Buerrosse@allegiancetelecom.com; bradbury@att.com; Brenda.Gant@kmctelecom.com; brian.feller@btitele.com; bshafer@covad.com; BSNotes@talk.com; BSTCarrier@birch.com; bstewart@biztelone.com; c-david.burley@Wcom.Com; c-Lorraine.Watson@Wcom.Com; c_and_m@bellsouth.net; caren.schaffner@Wcom.Com; casenjo@IDSTELCOM.com; CAshford@birch.com; cassandrap@networktelephone.net; Catherine.Gray@alltel.com; cbrackett@mpowercom.com; cchiavatti@usatelecominc.com; cdiacovelli@att.com; Cedric.Cox@Wcom.Com; cflanigan@uslec.com; Chad.Pifer@xspedius.com; changecontrol.bellsouth@onepointcom.com; CHaynes@nuvox.com; cheryl@eatel.com; cheryl_acosta@stratosoilandgas.com; clarson@dset.com; cmiller@telepak.net; CoDavis@covad.com; colleen.e.sponseller@Wcom.Com; Connie.Nathan@kmctelecom.com; craig.davis@centurytel.com; cschneider@concretio.com; csmallwood@City.marietta.GA.US; CSoptic@birch.com; cstevens@mpowercom.com; daddymax@netbci.com; daisy.ling@Wcom.Com; darrin.mcclary@centurytel.com; Davis, Kevin D; DCooley@nuvox.com; deberger@att.com; desiree@communitytelephone.com; dfeinberg@mettel.net; dfoust@deltacom.com; dkane@aspiretelecom.com; dlawal@focal.com; dmitchell@mettel.net; DNapovanice@birch.com; dnathanson@natelcomm.com; don@amexcomm.com; donaldsond@epb.net; donna.poe@knology.com; dparobeck@mettel.net; dpetry@ix.netcom.com; dwilliams@nowcommunications.com; egoldberg@mettel.net; Elliot.Wrann@dsl.net; epadfield@nextlink.com; ESingleton@eztalktelephone.com; eyu@talk.com; fouts@communitytelephone.com; frankb@cellone-ms.com; Fred.Brigham@Wcom.Com; Gary@CSII.net; generalg@cris.com; ggotimer@biztelone.com; Griffin, Lianne; Hamlin, Pat; hcarlton@sevenbridges.net; Heather.Thompson2@allegiancetelecom.com; jake.hayes@newsouth.com; Jan.Dumas@accesscomm.com; jason@basicphone.org; Jason.Lee@Wcom.Com; jboshier@covad.com; jbritton@phonesforall.com; Jdavid4715 @aol.com; JDuffey@PSC.STATE.FL.US; jeanacherubin@yahoo.com; Jeff.Walker@accesscomm.com; Jennifers@universaltelecominc.com; jerry@mclsystems.com; jerry.hill@accesscomm.com; jfury@newsouth.com; JG6837 @ctmail.snet.com; jjohnson@IDSTELCOM.com; jmartin@mpowercom.com; imclau@kmctelecom.com; jnugent@mettel.net; joanne.baxter@networktelephone.net; john.c.moran@Wcom.Com; JOliver@birch.com; JPilgrim@eftia.com; jsage@mpowercom.com; JtWilson2@att.com; jureidini@att.com; jwilwerding@birch.com; kandi.patterson@cox.com; karen.grim@mail.sprint.com; karind@covad.com; kbranch@newsouth.com; khudson@nextlink.com; KPollard@birch.com; ktimmons@att.com; Kyle.Kopytchak@networktelephone.net; launch-now.notify@accenture.com; launchnow.notify@cscoe.accenture.com; LCamillo@nwp.com; Idavidov@dset.com; leonb@psc.state.ga.us; LHamlin@birch.com; LHOPKINS@eftia.com; LMitchell@wisor.com; LMontele@usa.capgemini.com; lorna.richards@lecstar.com; lortega@commsouth.net; Louise.Wilds@accesscomm.com; lynnj@nowcommunications.com; margaret.ring@networktelephone.net; mark@annox.com; Mark.Ozanick@accesscomm.com; Mary.l.campbell@xo.com; mcbrunnhilde@juno.com; MConnolly@birch.com; mconquest@itcdeltacom.com; mdossey@biztelone.com; mer@networkwcs.com; mhillis@telcordia.com; michael.britt@lecstar.com; michael.dekorte@Lightyearcom.com; Micki.Jones@Wcom.Com; mnoshay@IDSTELCOM.com; MpowerHelpdesk@mpowercom.com; msykes@telcordia.com; mt7210@momail.sbc.com; MWagner@birch.com; Nancy.Welsh@espire.net; Natalie.Franklin@kmctelecom.com; NDreier@birch.com; oss-accessible-letters@covad.com; pamela.a.smith@mail.sprint.com; PBarker@aol.com; Pkinghorn@eztalktelephone.com; pmckay@momentumbusiness.com; pmcole@att.com; PPinick@birch.com; prehm@nightfire.com; PRubino@Z-TEL.com; Quan Nquyen@kmctelecom.com; Rae.Couvillion@Wcom.Com; rbennett@floridadigital.net; rbreckin@telcordia.com; rbuffa@interloop.net; rcostanzo@velocityky.com; Rdupraw@mpowercom.com; rebecca.baldwin@adelphia.com;

To:

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Cc: Subject: Williamson, Jill R RE: 11/15/02 Daily CAVE Testing Environment Status Report



ID: 11/15/02 -

Release 11.0 St...

<<ID: 11/15/02 - Release 11.0 Status Report>>

BCCM:

After reviewing the latest BST documents again, AT&T requests that BST update it's status report to list all defects identified from start to finish with Release 11.0 along with the its associated CR and current status.

The discrepancies between the two formats received on 11/15 are confusing and concerning.

Please provide an explanation of the differences between the number of Sev 2 defects identified with Rel 11.0 on the CAVE Report, which lists only 5 and the Release 11.0 Status Report shared on 11/15/02, which showed 22 Sev 2 defects.

What happened to 17 of the Sev 2s? How many have been fixed? Some are still waiting fixes due 11/19 or 11/20.

Since CR numbers are not listed on the CAVE Report it is impossible to tie defects to CRs. Please note CR numbers going forward.

What about the 41 Sev 2s described as "Other" on the Release 11.0 Status Report?

CLECs need for BST to provide additional details as to BST's plans for rectifying these 41 Sev 2s. Have additional "Other" Sev 1s or 2s been identified?

AT&T is encouraged to hear that BST has resources working Rel 11.0 around the clock. I just hope they stay alert and accurate as fatigue can be deadly.

Bernadette Seigler AT&T Local Services & Access Management So. Region OSS Interconnection V: 404-810-8956

Fax: 281-664-3731

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--Original Message--

Change.Control@bridge.bellsouth.com > From:

> [mailto:Change.Control@bridge.bellsouth.com]

> Sent: Friday, November 15, 2002 6:18 PM

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- > alee@epicus.com; alejandro@amexcomm.com; amanda.hill@wcom.com;
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- > Bill.York@wcom.com; billg@telcordia.com; bmurdo@KMCTELECOM.com;
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- > Yvette.Brown@espire.net
- > Subject: ID: 11/15/02 Daily CAVE Testing Environment Status
- > Report
- > << File: SEND >> << File: 1115DA~1.DOC >>

RELEASE 11.0 STATUS REPORT Updated as of 11/14/02

હ	Harvest #	Description	See O	Code Ship	Closed from	o o	Code Shin	Code Shin Closed from		Notes	Γ
		ď						un la di		3	-
			Severny 1	X D	Last Report	Severny 2	ž Ž	Last Keport			
CR0040	22058,	Order Tracking Phase 2b-CCP Prioritized-5						2			
	23189,										
97.70	25389										
CKUI/0		Provide Solicited Notifications in 186 (part of XML									
02100		schema)-4									
CKOI/A		I AG Navigator to CORBA Bridge Router (part of XML		:							
	T	schema)-4									
CR0228		ACT of T-4				4	3 on 11/19	2			
	6179, 6308						1 on 11/13				
	T		-								
CR0241		CN Returned on Incorrect LSR Version for xDSL, UCL &									
	\neg	EELS, Phase 2-5									
CR0351	13883	Listing Activity Only should=REQTYP J & ACT=R, if not, LSR				1	1 on 1/20				
		will reject back to CLEC-6									
CR0461	22975	Ability To Do A Facility Check On LSRs Before The Order									
-		Is Completed (Tennessee)-2									
CR0492	6104	LENS to Flow-Thru Coin LSRs-2				8	1 on 11/15	1			
	9244, 6302				:		1 on 11/20				<u> </u>
	П										
CR0541	20368	Mechanization of Unbundled Copper Loop-Non Designed				13	2 on 11/13	11			
		(UCL-ND)-excluding LNP-2					3 on 11/15				
							2 on 11/20				
	Т										
CR0621		ECCKT Not Returned on Mechanized or Manual Loop Orders				-					. :
20,000	Т	Tor Line stare Orders-o					I				
CACOCO	14050	Mech Removal of USL With OINE-F conversions, LINE-V-C						8			
CAULES	Т										T
cKO/28	21240	Mapping Error should send message to CLEC to re-submit						-			******
CR0779	21915	LineSharing Order Completion Sequencing Error on R&C									T
		Order-6									-
CR0788	23192	LNP intermittently assigns TNs to another customer on									Γ
		Remote Call Forwarding-6									
CR0801	22271	ISA Time not being returned for PON List Queries for							į		
	T	xDSL, UDC and EELS-6									
CR0842	22113	Incorrect next available due date calculated on SUP when no anger existed.			٠.						
CR0850	21977	xDSL ACT of T. Sun's should dron for manual handling-6									T
22222	7	א שייייייייייי וישוושווי או לו שו שומונה כ להכ ו וכן ואר ארסבלי			T						

RELEASE 11.0 STATUS REPORT Updated as of 11/14/02

ક	Harvest #	Description	Open	Code Ship	Closed from	Open	Code Ship	Code Ship Closed from	Ž	Notes	
		Feature/Defect	Severity 1	to Fix	Last Report	Severity 2	to Fix	Last Report			
CR0871	22288	Auto-Clarify indicating that CLEC does not own the acct-6									r
CR0873	22556	LENS-disconnect number on Reqtyp A may be repeated multiple times on the LSR summary-6								·	<u> </u>
CR0891	22586	LENS is not showing the RESID as populated on the LENS LSR summary-6									
CR0920	22925	Pre-Order LMU - Un-numbered House indicator is not working-6									
CR0927	22985	UCL-ND Firm Order - Defective Error Message-6							-		
CR0928	1	UCL-ND Firm Order - ECCKT Not Returned on disconnect orders-6									
CR0929	21915	UCL-ND Firm Order - Completion notice not being returned on conversion orders-6									
CR0930	22972	UCL-ND Firm Order - Cancellation notice not being returned on conversion orders-6									I
CR0936	23020	Facilities Check Indicator is not being processed correctly- 6					-				
CR0937	23028	SUPSs Flowing with incorrect version-6									
CR0977	22256	PD status notifications returned after CP status is received- 16									
¥ N		TAG XML Transition				2	1 on 11/15 1 on 11/18				
V N		Other				4	6 on 11/13 8 on 11/15	ī.			
							1 on 1/18		er er		
							2 on 11/20				
			ļ								ı

% Testing Complete: 87.90%

NOTES: 1. "Other" represents defects that are not associated with a specific feature. Such defects could be related to environment, existing 2. Not all defects indicated above have been validated.

EXHIBIT 2

BELLSOUTH

September 5, 2002 2003 Releases/Release 13.0 Package Meeting MEETING MINUTES

MEETING NAME	MINUTES PREPARED BY:	DATE PREPARED
ACCOMPANY.		
题243.11.15注意第15.11.11		
Selected and Little		

Participants/Attendees	COMPANY
Cheryl Storey	BST - CCP
Valerie Cottingham	BST - CCP
Jay Bradbury	AT&T
Cheryl Haynes	NuVox
Kathy Rainwater	BST - CCP
Bill Grant	Telcordia
Tami Swenson	Accenture
Mary Conquest	ITC Deltacom
Louis Davido	Dset
Tom Norvell	DCA Services
Amanda Hill	WorldCom
John Duffey	FL PSC
Brenda Slonneger	BST – ELMS6 Proj Mgr
Milton McElroy	BST

PARTICIPANT	COMPANY
Nicole Kisling	Birch
Meena Masih	BST – Release Mgr
Gary Jones	BST Flow Through
Jill Williamson	BellSouth Technology
Stacey Hassan	Birch
Dale Donaldson	Epb Telcom
Mel Wagner	Birch
Heather Thompson	Allegiance
Bernadette Seigler	AT&T
Sherry Litchenberg	WorldCom
Cindy Schneider	Concretio
Colette Davis	Covad
Susan Montgomery	BST - ELMS6

Meeting Information History

DATE	START TIME	END TIME	
9/5/02	10:30 AM ET	Noon	
Conf Bridge			

MEETING PURPOSE



September 5, 2002 2003 Releases/Release 13.0 Package Meeting MEETING MINUTES

MEETING MINUTES

Agenda Items	Discussion
1. Introductions/Welcome	Cheryl Storey (BST-Change Management Team) welcomed everyone and stated that the purpose of this call was to discuss the following:
	Overview of BellSouth's Proposed Plan to implement Change Requests within 60 weeks of Prioritization Meeting
THE STATE OF THE S	 Review/discuss the targeted release content for Release 13.0 – CLEC Production Release
	Confirm the Prioritization Meeting on 9/25/02
2. Overview of BellSouth's Proposed Plan to implement Change Requests	Jill Williamson (BST) stated that there are several drivers for the proposed changes in the 2003 Release Schedule:
within 60 weeks of Prioritization Meeting	 Florida metric to address implementation of change requests in 60 weeks from prioritization. The Florida Public Service Commission (PSC) requested a plan from BST on how to clear the backlog of change requests. This proposal was submitted to the FL PSC on 8-30-02. A copy was also distributed to the CLEC community on 8-30-02.
	 New defect correction metrics – 10, 30 and 45 business days
	 EDI Pre-Ordering sizing much larger than expected. EDI Pre- Order will require infrastructure changes to XML standards.
	Overlap in Release 14.0 & 15.0 test cycles
	Jill commented that when the 2003 Release Schedule was first presented to the CLEC community, these factors were not known.
	Sherry Lichtenberg (WorldCom) questioned why the changes were impacting the CLECs now. Jill replied that this impacts them because the FL PSC requested BST to provide a plan that addresses the backlog of CRs.
	Sherry also commented that at a previous meeting BST indicated that there were no impacts to the EDI infrastructure. Meena Masih (BST) stated that at the Release 12.0 Package Meeting, BellSouth indicated that analysis was still being performed to determine if supporting infrastructure changes would be needed for some of the change requests. Meena added that BST/CLEC collaborative meetings have been held to discuss Interactive Agent standards and EDI Pre-Order requirements.



September 5, 2002 2003 Releases/Release 13.0 Package Meeting MEETING MINUTES

	MEETING MINUTES	
Agenda Items	Discussion	
	Jay Bradbury (AT&T) commented that Release 12.0 was initially going to be an Infrastructure release and questioned if this was changed because the sizing was larger than anticipated. Jill replied that Release 12.0 was originally a BST Release and that additional capacity is needed to focus on CLEC requirements. BST plans to give CLECs more than 50% of capacity to implement CRs. Capacity may have to be moved around to accommodate all the CRs. It is BellSouth's intent to implement CRs in priority order where possible.	
	Jay commented that with the movement of IA and EDI Pre-Order to Release 13.0, four flow through items were scheduled for Release 12.0, which equates to 96 units. Jay questioned what's in the balance for Release 12.0. Jill stated that BST is evaluating what other features can be added to Release 12.0. The capacity may be made up on the backend. The plan is not to implement BST changes in Release 12.0. If the capacity cannot be provided in 12.0, it will be spread across Releases 13.0-15.0.	
	Jay expressed concern with delaying Infrastructure changes. Jill stated that it is important to BST to migrate from LEO to the IDN platform. She advised that delaying the implementation of the Infrastructure changes will not jeopardize the stability of the interfaces. BST plans to implement the Infrastructure changes as ELMS6 is implemented. Jill reaffirmed that stabilization of the interfaces is important to BellSouth. Jay questioned the sizing for the Infrastructure changes. Jill stated that the sizing is not known at this time.	
	Sherry questioned if the reason for this meeting was because of the FL order. Jill stated that the 2003 release proposal is a direct result of the FL PSC's request for a plan to clear the backlog. The current 2003 Release Schedule doesn't provide the ability to completely implement the backlog. Meena added that this was a planned Release 13.0 Package Meeting per the current 2003 Release Schedule. Valerie reiterated this.	
	Jill reviewed the presentation regarding three options for 2003 releases. The current schedule will provide the following:	
	Maintains the current number & dates of releases (the schedule stays the same)	
	 Interactive Agent and EDI Pre-Order in Release 13.0. 	
	Contains overlap in testing between releases	
	Maintains implementation of ELMS6 in 2003	
	 Limits the number of sized CCP prioritized features that can be implemented in 2003 	
	The current schedule does include the TAG XML Transformation.	



September 5, 2002

2003 Releases/Release 13.0 Package Meeting MEETING MINUTES

Agenda Items	Discussion
	Proposal 1 includes the combining of Release 12.0 & 13.0 with a targeted implementation date of 5/30/03. Proposal 1 summary:
在各种的原则是不是一个。 一种,是一种,是一种,是一种,是一种,是一种,是一种,是一种,是一种,是一种,是	Reduces risks by eliminating overlapping release phases
(公司) (1975年)	Interactive Agent and EDI Pre-Order in Release 12.0/13.0
	BST & CLEC testing improved by removing overlap of release test cycles
	Allows for scoping of all sized CCP features and many FTTF features (clears the backlog)
	Delays the final implementation of the industry release from November 2003 until early 2004. CAVE testing for the industry release would begin early February 2004. This includes the infrastructure changes.
	Proposal 2 includes the removal of Release 14.0 and adding capacity to Release 15.0. Proposal 2 summary:
The second state of the se	Maintains implementation of ELMS6 in 2003.
	Interactive Agent and EDI Pre-Order in Release 13.0.
The second secon	Removes most of the overlap in testing between releases.
	Limits the number of sized CCP prioritized features that can be implemented in 2003.
	Jill reiterated that BellSouth is committed to clear the backlog of change requests. The CLEC community needs to select which option they want BST to implement. Jill commented that capacity will be lost everyday that we wait to make a decision on a 2003 release option.
	Jay stated that there are many more options that are available to the CLECs and BST. He also stated that additional information is needed before CLECs can select an option. Jay stated that they do not want to blindly jeopardize the stability of the interfaces.
	Sherry expressed concern with the movement of Interactive Agent & EDI Pre-Order to Release 13.0. Jill advised that based on the analysis of work to be performed for IA and EDI Pre-Order; it would be a large risk to implement these CRs in Release 12.0. By moving these to Release 13.0, it provides additional time to reduce the risk. Jay questioned if the implementation of IA and EDI Pre-Order could be split, such as IA in 12.0 and EDI Pre-Order in 13.0. Jill agreed to investigate.



September 5, 2002

2003 Releases/Release 13.0 Package Meeting MEETING MINUTES

	MEETING MINUTES
Agenda Items	Discussion
	Jay stated that the CLECs need the targeted content (a forward looking view) for each 2003 release proposal and that a choice cannot be made by the CLECs without this information. Bill Grant (Telcordia) agreed. Meena stated that per the CCP process, there is a schedule for providing release content and for scoping releases. Milton McElroy (BST) stated that BST wanted the CLEC community to consider the options that were presented, at a framework level, since these options reflect the plan to address the backlog of CRs. The 60-week metric begins 9/25/02. BST is trying to meet the FL order.
	Milton reiterated that Proposal 1 allows BST to work the backlog in 2003.
3: Release 13:0 Package	Meena stated that Release 13.0 is scheduled for 5/17/03-5/18/03. The change requests that are targeted for Release 13.0 are:
是一种的人。 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	CR0186 – Interactive Agent
The second secon	CR0101 – EDI Pre-Order
	CR0629 – Key Indicator on CSR – TACT FID
	 CR0652 – Translate & Parse Data for the following: TOA, BRO, STYC, DGOUT, TOS, LNPL
	CR0176 – Allow PIC & LPIC to be submitted as No Change
	CR0085 – Web-based LSR
	CR0466 – Printing of the LENS CSR
	 CR0113 – LENS Inquiry – View Customer Record – Use 3-digit customer code in validation logic
The second secon	CR0440 – ERL Field (EU Form) Change
THE STATE OF THE S	CR0392 – LENS/TC Option for Completed Orders
	CR0088 – Mechanization of Unbundled Network Terminating Wire (UNTW)
	CR0866 – Mechanization of EELS
	Jay requested the preliminary sizing for CR0866-Mechanization of EELS. Jill replied that the preliminary sizing for CR0866 is 67.5 units. Jay commented that the CRs for Release 13.0 equate to 491 units and questioned what the balance of capacity would be utilized for. Jill explained that BST reserves 5% of capacity for mandates and 5% for changes in scope/defects – a total of 10% reserve.
profiles the second sec	Jill stated that BST is still evaluating CR0127 – Provide Notification that a CSR is pending a service order in TAG for Release 13.0.



September 5, 2002 2003 Releases/Release 13.0 Package Meeting MEETING MINUTES

Agenda Items	Discussion
	Sherry questioned why Priorities 3 through 5 were skipped and not part of the Release 13.0 scope. Jill advised that Priority 3 (CR0184/CR0246-Ability to view Resold/UNE-P CSRs) and Priority 4 (CR0443-Billing Completion Notifier) were complex requests. BST is still in the analysis and detailed design phase to determine the solution on how to implement this functionality. For CR0443, coordination is also required with the Billing group. Jill stated that these CRs would probably be slotted for Release 14.0. Release 14.0 has not been scoped. The Release Package Meeting for Release 14.0 is scheduled to take place by 1/10/03.
	Bernadette questioned if there was an option to add more capacity. Jill replied 'no'.
	The CLECs again stated that they could not vote on a release option for 2003 without additional information. Jill stated, that given the timeframes, BST would not be able to provide release content for every release. Mel Wagner (Birch) questioned if the flow through items were included in the FL order. Jill replied that not all flow through items may get worked. They have all been sized, approximately 1000 units.
	The CLECs decided to have a CLEC meeting after this call to further discuss the proposal for 2003 release options. Bernadette and Sherry agreed to be the spokespersons for the CLEC community and provide BST with the results of the call via email.
4. Confirm Prioritization Meeting on 9/25/02	The CLECs advised that the 9/25/02 Prioritization Meeting is to be held as scheduled.
5. Summary of New Action Items	The section A cont

NEW ACTION ITEM: BellSouth to investigate implementing Interactive Agent in Release 12.0 and EDI Pre-Order in Release 13.0.

NEW ACTION ITEM: CLEC Community to meet and discuss proposal for 2003 release options. Bernadette Seigler (AT&T) and Sherry Lichtenberg (WorldCom) agreed to be the spokespersons for the CLEC Community and advise Change Control of the results of the meeting.

EXHIBIT 3



September 13, 2002 2003 Release Schedule Meeting MEETING MINUTES

	itorio (Palifillia)		
Participants/Attended	COMMANA.	MATICANT	COMPANY
Steve Hancock	BST-CCP	Mel Wagner	Birch
Valerie Cottingham	BST - CCP	Stacey Hassan	Birch
Jill Williamson	BST - CCP	Bob Carias	Nightfire
Dennis Davis	BST - CCP	Hollis Carlson	Seven Bridges Comm.
Bernadette Seigler	AT&T	Suzie Lavett	BST - Project/Product Management
Bill Crant	Telcordia	Tyra Hush	WorldCom
Tami Swenson	Accenture	Rick Whisamore	WorldCom
Mary Conquest	ITC Deltacom	Heather Thompson	Allegiance
Louis Davido	Deet	Jeremy Bata	Access Integrated
Bob Bourasse	Allegience Telecom	Sherry Litchenberg	WorldCom
Chris lacovelli	AT&T	Cindy Schneider	Concretio
John Duffey	FL PSC	Colette Davis	Covad
Brenda Slonneger	BST - ELMS6 Proj Mgr		

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September 13, 2002 2003 Release Schedule Meeting MEETING MINUTES

MEETING MINUTES

Agenda Items	Discussion
	Steve Hancock (BST-Change Management Team) welcomed everyone and stated that the purpose of this call was to discuss the following:
Topic Control of the	Review BellSouth's proposed 2003 Release Schedule



September 13, 2002 2003 Release Schedule Meeting MEETING MINUTES

Agenda items	MEETING MINUTES Discussion
2. Overview of BellSouth's Proposed 2003 Release Schedule	Jiff Williamson (BST) stated that two (2) documents have been provided to the CLECs: 2003 Release Schedule Proposal and the List of Prioritized Change Requests. The CLEC option submitted to Change Control is referred to as Option 1 on the proposal. Option 2 will reflect BellSouth's option of maintaining Releases 12.0, 13.0, & 14.0 in 2003 and moving ELMS6 into 2004. BellSouth has attempted to give a potential scope for both Options. Jill explained that whichever option is chosen, BellSouth will prepare a finalized scope and schedule and distribute back to the CLECs within 2 weeks from the time an option is selected by the CLECs.
	Sherry Lichtenberg (WorldCom) acknowledged appreciation for the work effort that BST had put into the preparation of the 2003 Release Options. She asked if BST will make a joint decision with the CLECs' input and if BST will be asking the CLECs to vote on which option package they desire. She also pointed out that since the GA PSC has made its recommendation, BST should ensure that it will not be changing the prioritization order of any previously prioritized requests. Jill Williamson stated that BST would not be changing the prioritization order and that BST will meet with the CLECs to discuss the final recommendation.
	Jill addressed the estimated capacity in each option listed in the Release Schedule Proposal. She pointed out that Release 12.0 is firm, the units will remain the same at 182. This will include Interactive Agent/Firm Order, four (4) Flow Through features, and CR0652 - Translate and Parse data for the following information on CSR (TOA, BRO, STYC, DGOUT, TOS and LNPL). Jill also pointed out that with the estimates for Option 1, Release 13.0 will contain 600 units with an implementation date of 06/08/03.
	Jill explained that there will be a NANC 3.2 (LNP Industry Release) in May, 2003. The LNP Industry Forum will dictate BellSouth's implementation dates for this release. Jill stated that the NANC Release in 2001 required approximately 99 units of capacity but pointed out that this release will require a large LNP resource capacity and the complexity of this release should be defined by November, 2002. The tentative dates for the 2003 NANC Release will be May, 2003. Sherry Lichtenberg (WorldCom) asked if this NANC Industry Release will be correcting the current NPAC problems. Jill stated that this Industry Release was not related to any NPAC problems.
	Tyra Hush (WorldCom) asked if BST would be implementing all of CR0443 - Billing Completion Notifier. Jill explained that BST would be implementing Phase I at this time.
	Sherry Lichtenberg (WorldCom) asked what will happen if BST cannot do Phase I of CR0443 in Option 1. Sherry also pointed out that if BST cannot get this work request implemented, the CLECs will be forced to go to a commission to get an order. Jill acknowledged the CLECs' concerns.
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September 13, 2002 2003 Release Schedule Meeting

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Agenda Items	Discussion		
	Sherry Lichtenberg asked why CR0284 (#5) is not currently in Option 1 or Option 2? Jill explained that this request involves a large LNP work effort and given the NANC 3.2 release in May, 2003, the capacity for LNP work in the 12.0 and 13.0 release timeframes is significantly limited.		
	Bernadette Seigler (AT&T) expressed her concerns that caveats are being placed around several change requests. Bill Grant (Tekordia) asked if BST could use any of the 210 Reserve units in another release, possibly 15.0. Jill stated that BST would investigate this. Bernadette Seigler (AT&T) asked if the 210 Reserve units was equivalent to 10% of release capacity that BST had previously stated it would put in reserve capacity. Jill explained that BST placed as much capacity into the Release as possible.		
	Bernadette Seigler (AT&T) asked if BST has published the CAVE windows associated with the 2003 Release Proposal. Jill explained that the CAVE windows in 2003 will be as follows:		
	Option 1:		
	 Release 12.0 - Pre-1/27 - 3/28/03, Post-3/30 - 5/29/03 		
	• Release 13.0 - Pre-4/8 - 6/6/03, Post-6/8 - 8/8/03		
	• Release 15.0 (ELMS6) - Pre-9/22 - 12/11/03		
	Option 2:		
	Release 12.0 - Pre-1/27 - 3/28/03, Post - 3/30 - 5/29/03		
	• Release 13.0 - Pre-4/8 - 6/6/03, Post - 6/8 - 8/8/03		
	• Release 14.0 - Pre-7/24 - 9/25/03, Post-9/28 - 11/26/03		



September 13, 2002 2003 Release Schedule Meeting

	MEETING MINUTES
Agenda Hems	Discussion
	Jill Williamson pointed out that although in Option 2, ELMS6 is proposed for Release 15.0 in 2004, the majority of the work effort will be done in 2003. Sherry Lichtenberg (WorldCom) asked why ELMS6 would not be implemented until April, 2004? Jill further explained that this is due to the fact that Release 14.0 still remained in the Option 2 proposal.
	Sherry Lichtenberg asked BST to confirm that in order for #4 ranked change request (CR0443), to get into Release 13.0, BST had to push ELMS6 out a year. She also questioned why it appeared that BST was concentrating on implementing the majority of requests except CR0443.
	Jill explained that it is BST's goal to implement all of the prioritized requests in priority order as capacity, timeframes and other factors allow; however, BellSouth initially concentrated on the top two requests, which are both very large, soon after the 5/22/02 prioritization meeting. The efforts around CR0443 have been ongoing, however the impact was not finalized by all applications until recently.
	Bob Carias (Nightfire) asked if wireless LNP was still in BST's plans for 2003. Jill stated that it was; however, it would not take away any resources from the CCP 2003 Release capacity.
	Valerie Cottingham (BST) pointed out that the Summary of candidate requests reflected CR0621 in Release 14.0. This is a typo and should reflect Release 11.0, as it is currently scheduled.
general de la companya de la company	Bernadette Seigler (AT&T) questioned the sizing estimate for CR0621. Jill stated that she did not have this information but will provide it.
ACTI	ON ITEM: BellSouth to provide sizing estimate for CR0621. (17.67 units)



September 13, 2002 2003 Release Schedule Meeting

	MEETING MINUTES
Agenda Items	Discussion
	Bernadette Seigler (AT&T) asked when BST will be able to schedule the remaining Flow Through Task Force items. Jill explained that she currently does not have the details; however, this will be discussed during the next FTTF meeting scheduled in Oct, 2002.
	Bernadette Seigler (AT&T) stated that the CLECs had submitted concerns in their recent proposal regarding the need for BST to push TAG & XML verstion retirements out to Dec., 2002. Jill Williamson asked for clarification on AT&T's request, which asks for a 90 day extension of the TAG version retirements currently scheduled for May, but also for the retirements not be retired before December, 2003. Bernadette and Bill Grant (Telcordia) explained that the CLECs want to ensure that a 90-day window is given.
	Jill Williamson explained that BST will agree to allow the 90-day window for retirement of these versions. Sherry Lichtenberg (WorldCom) asked that BST document this with its final proposal.
	Bill Grant (Tekordia) asked when BST will be making its infrastructure changes. Jill explained that the majority of infrastructure changes will be done with ELMS6 and details will be provided at a later date.
	Valerie Cottingham (BST) stated that BST will submit a ballot to the CLECs on Monday, 9/16, asking for them to choose which option they prefer BellSouth to proceed with. The CLEC response will be due by COB, Wednesday, 9/18.
	EW ACTION ITEM: BellSouth to provide sizing estimate for CR0621. (17.67 nits)

EXHIBIT 4

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November 4, 2002 Release 11.0 Status Meeting MEETING MINUTES

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AT&T
Telcordia
Accenture
ITC Deltacom
DSET
Allegience Telecom
BST - CCP
FL PSC
BST - Testing
BST - CLEC CARE
BST - CLEC CARE
BST - LCSC
BST - CCP
BST - Network Services
AT&T
Telcordia
Covad

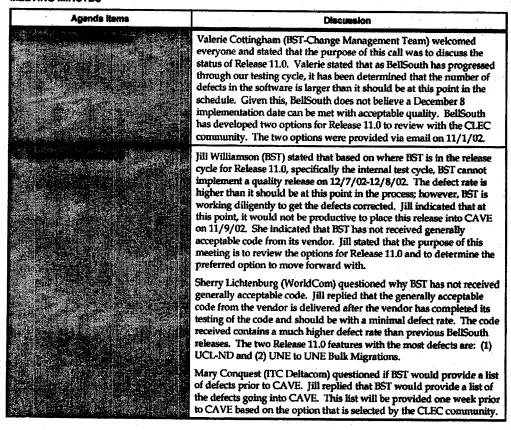
PARTICIPANT	COMPANY		
Nicole Kisling	Birch		
Dee Freeman-Butler	BST - General Manager-Local Operations		
Cheryl Storey	BST - CCP		
Dale Donaldson	Epb		
Kyle Kopytchak	Network Telephone		
Tyra Hush	WorldCom		
Steve Hancock	BST - CCP		
Kevin McCall	BST - User Req'mts		
Lucious Turner	BST - Network Svcs		
Doyle Mote	BST - LCSC		
Alan Tarr	BST - LCSC		
Jim Tadlock	BST - SVP		
Eric Paschal	BST - Testing		
Amanda Butler	BST - CLEC CARE		
Janet M. Fields	BST - Customer Care		
Gary Jones	BST - Flow Through		
Jeff Bragg	BST - TAG XML		
Ross Martin	XO		
Sherry Lichtenburg	WorldCom		
Mel Wagner	Birch		
Cheryl Haynes	Nuvox		

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November 4, 2002 Release 11.0 Status Meeting MEETING MINUTES

MEETING MINUTES





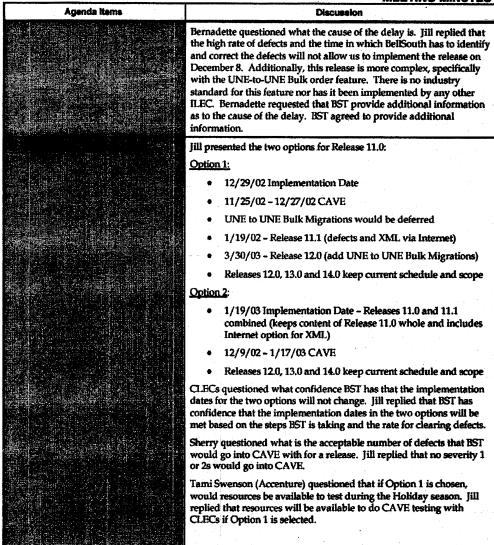
November 4, 2002 Release 11.0 Status Meeting MEETING MINUTES

MEETING MINUTES		
Agenda items	Discussion	
	Bernadette Seigler (AT&T) commented that there were 59 defects when BST went into CAVE for the last release. Bernadette also stated that based on the FCC filing, there were currently 629 defects. Jill stated that the scope of Release 11.0 is twice as large as 10.5 or 10.6 and much more complex than previous releases. Jill also commented that the 59 defects reflect the number of defects in the code delivered to BST by the vendor, not the number of defects BST went into CAVE with. Jill restated that BST received the initial code from the vendor and that the defect rate in this code was high.	
	Colette Davis (Covad) questioned why the CLECs are just now hearing this information. She also stated that CLECs are placed in a position to respond to a situation that BST and its vendors have created. Colette stated that she is very concerned and that CLECs need to count on releases being implemented when committed.	
	Mel Wagner (Birch) commented that CLECs need a better understanding of how this happened. He stated that Release 11.0 has been delayed once and that Birch submitted an appeal regarding this delay and the appeal was denied. Mel stated that Birch is not willing to push out the Release 11.0 implementation date.	
	Jill stated that given the status of the release, it is not an option to implement Release 11.0 on 12/7/02-12/8/02.	
	Sherry questioned why BST thinks that it will receive good code from its vendor. Jill replied that BST is working with the vendors to correct and turn around defects. BellSouth made the determination last week that the release date for 11.0 would need to be changed and began evaluating alternatives. BST filed with the FCC on Friday, explaining that the Release 11.0 date would not be met and why, and provided the two options that are being presented to the CLECs today.	
	Kyle Kopytchak (Network Telephone) questioned if this is due to a resource issue. Jill replied 'no'. Kyle questioned if this will affect future releases. Jill replied 'no'. Kyle also questioned how defects will be treated that are discovered by CLECs. Jill stated that defects will be handled via the CCP process based on severity. Kyle then questioned if BST had communicated this information to the FCC. Jill replied 'yes'. Kyle asked if the information communicated to the FCC was different than what was being communicated today to the CLECs. Jill replied 'no'. Kyle commented that some defects are reclassified as features and then would need to follow the prioritization process. Kyle requested that BST assist the CLECs with the validation/classification of the items that are defects in this release.	



November 4, 2002 Release 11.0 Status Meeting

MEETING MINUTES



November 4, 2002 Release 11.0 Status Meeting

MEETING MINU		
Agenda Items	Discussion	
	Sherry questioned if there would be an overlap in testing between Releases 11.0 and 12.0 with Option 2. Jill replied that Option 2 would cut the post-soak window short, but not the pre-soak window.	
	Sherry asked Jill what option she would select if she was in a CLEC position. Jill replied that it's up to each CLEC's individual needs. From a personal perspective, she would select Option 2 because it includes all of Release 11.0 content.	
	Sherry questioned what additional internal checkpoints BST would make. Jill advised that more frequent checks are being made at the officer level within BST and with our vendors. Sherry commented that the CLECs need to understand the root cause to ensure the problem is being addressed. Colette questioned if officers were already aware of these issues. Jill replied that the officers are aware of every release and intervene, if necessary. Kyle questioned if the officers are involved because of 271 and requested that this be added to the CCP guide. Jill replied that our officers have always been kept apprised of the releases and are involved as much as necessary. The internal involvement of personnel is an internal process and shouldn't be documented in the CCP guide.	
	Jill commented that BST will have a checkpoint with the CLECs every two weeks.	
	Bernadette requested that BST provide capacity per system. Jill stated that this information is not available at the point of prioritization and that, as stated on previous occasions; it is not a fixed number. The capacity varies by application and by phase for each release.	
	Dee Freeman Butler (BST) recommended Option 2 because it offers a fewer number of releases in 2003.	
3. CLEC Feedback	After the CLEC meeting, Sherry presented the following:	
	CLECs agree to BellSouth's option 1 with conditions. They requested that BellSouth provide the following information on a twice a week basis:	
	1. Status on Mondays and Thursdays	
	Complete listing of the number of severity 1 and severity 2 defects and the process being used to close them	
	3. Plan to meet the due date	
	4. Final go/no go on 11/18/02	
	In addition, CLECs want a complete escalation of what BellSouth is doing to ensure that these problems do not continue on an on-going basis, a firm commitment to fix defects found in this release, and an explanation of what actually caused these problems (resources, programmer problems, poor specifications, etc.)	

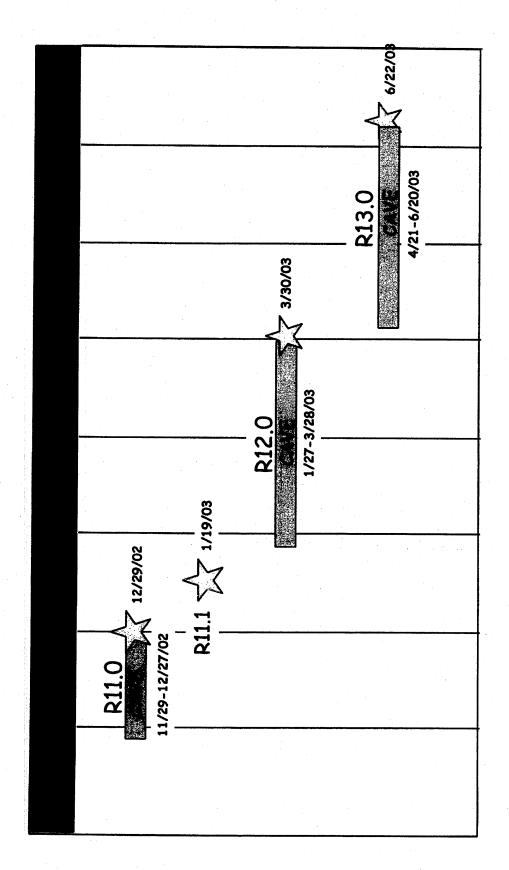
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November 4, 2002 Release 11.0 Status Meeting MEETING MINUTES

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Agenda Items	Discussion
	Jill indicated that BST can support the checkpoints and will investigate how much detail can be provided. BST committed to provide a response to the CLECs by close of business on 11/5/02. The response regarding root cause information will be provided at a later date.

NEW ACTION ITEM: BellSouth to provide a response to the CLEC community by COB on 11/5/02 regarding the CLEC feedback & additional points for Option 1-Release 11.0.

Option 1

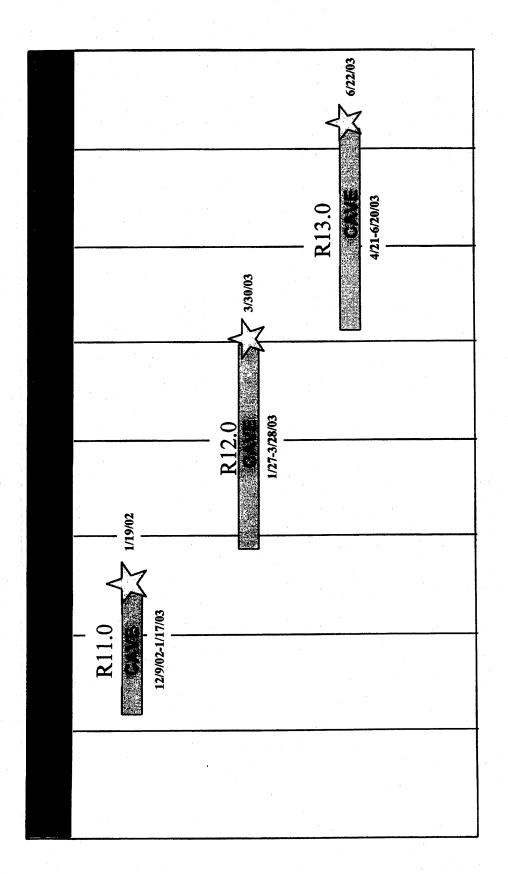


NOTE: CAVE windows represent pre-soak only.

Option 1 Summary

- Defer implementation of Release 11.0 to December 29; CAVE testing to begin December 2.
- Defer delivery of UNE-P to UNE-L feature from scope of 11.0.
- Implement UNE-P to UNE-L feature with Release 12.0 on March 30, 2003. CAVE testing to begin on January 27, 2003.
- **Benefits:**
- Improves chance of successful implementation of Release 11.0.
- Reduces scope of testing and pre-production defect correction.
- Focuses resources on remainder of release
- CLEC Impact:
- Requires two releases for full functionality
- 3 week delay in majority of release and 15 week delay in UNE-P to UNE-L

Option 2



NOTE: CAVE windows represent pre-soak only.

Option 2 Summary

- release scheduled for January 19, 2003. CAVE testing to begin Defer implementation of Release 11.0 until the maintenance December 9, 2002.
- Includes all features, including UNE-P to UNE-L and XML for internet users.
- **Benefits**:
- All Release 11.0 planned features, including full UNE-P to UNE-L functionality, will be installed together.
- Combining of 11.0 with the maintenance release results in less releases to manage.
- Improves chance of successful implementation of Release 11.0.
- . CLEC impact:
- Six week delay in implementation of full feature set.

EXHIBIT 5



@ BELLSOUTH

January 15, 2002 User Requirements Review-Releases 10.3.1, 10.4 & 10.5 MEETING MINUTES

Participants/Attendees	COMPANY	PARTICIPART	COMPANY
Cheryl Storey	BST - CCP	Jane Scott	RST
Valerie Cottingham	BST - CCP	Dale Donaldson	epb
Dennis Davis	BST	Wanda Venhuizen	BST
Vanessa Thomas	BST	Ken Cook	BST
Susie Hillis	Telcordia	Tyra Hush	WorldCom
Rall Grant	Telcordia	Sarah Pelzer	BST
Chris Allen	BST	Bernadette Seigler	AT&T
Joanne Baxter	Network Telephone	Sandy Tonjes	WorldCom
Peggy Rehm	Nightfire	Butch Stahlberger	XO Comm
Tami Swenson	Accenture	Brenda Honore	BST
lean Tyler	BST	Debra Johnson	BST
Renae Stewart	BST	Tom Hyde	Cheyond
Ceaser Lugo	Mpower	Jack Sheehan	KMPG
Fred Brigham	WorldCom	Chris Iscovelli	AT&T
Lorraine Watson	WorldCom	Mary Campbell	XO
Rick Woodhouse	WorldCom	Mel Wagner	Birch
Kyle Kopytchak	Network Telephone		

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January 15, 2002 User Requirements Review-Releases 10.3.1, 10.4 & 10.5 MEETING MINUTES

MEETING MINUTES

Agenda Items	Discussion
1. Introduction	Cheryl Storey (BST-Change Management Team) opened the meeting and stated that the following topics would be covered:
	Overview of "Single C Order" Feature
	 As a follow up from our 12/18/01 meeting, address any questions regarding the updated User Requirements for leatures to be implemented with Releases 10.3.1 and 10.4.
	 Review User Requirements for an expedited feature associated with hunting that is scheduled for implementation with Release 10.3.1.
	 Review of User Requirements for features to be implemented with Release 10.5.
	 Review Action Items & Assign Owners
2. Single C Overview	Renae Stewart (BST) provided a high level overview of Single C. Single C allows BellSouth to process the local service request (from a CLEC) by converting an account to UNE-P via the issuance (by BST) of a single C (Change Order). Today, two orders (New and Disconnect Orders) are required to execute the local service request.
	Conversion scenarios to be included:
	Resale to UNE-P (Same or different CLEC)
	Retail to UNE-P (BST to CLEC)
	UNE-P to UNE-P (CLEC to CLEC)
	Account types planned: Residence and Non-Complex Business
	The benefit of Single C is that it eliminates the need for two internal BST orders and associated coordination. There is no change in the LSR inputs or processing by CLECs. The only change is what the CLEC will see: the FOC and CNs will display a 'C' instead of 'N' for the service order. There is no change in CLEC functions. Changes will be required for the BST internal ordering/billing processes.
	Single C is scheduled for implementation with Release 10.4 on 4/6/02.
	CLECs questioned if they could test Single C. BST replied that CLECs could follow the normal process to request testing of Single C. Single C can be incorporated into their test scenarios.
	CLECs questioned the change request number for Single C. BST CMT replied there is no CR number since this request is not CLEC impacting from a coding standpoint. BST also indicated that Single C will also be communicated via Carrier Notification Letter.

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January 15, 2002 User Requirements Review-Releases 10.3.1, 10.4 & 10.5

		MEETING MINUTES		
Agenda Items		Renae stated that Single C will roll out by Regional Accounting Office (RAO) as follows: Georgia, Mississippi, Louisiana and Florida. BellSouth will provide the roll out plan for Single C as soon as it is completed. CTION ITEM: BellSouth CMT to investigate including internal changes e release package. CTION ITEM: BellSouth to investigate if CAVE generated orders can be in CSOTS. CTION ITEM: BellSouth to provide the roll out plan for Single C as it is completed. Jane Scott (BST) led the review of the user requirements for Validation of TN vs Address for Additional REQTYPs. This is associated with CR0371. The purpose of this enhancement is that certain REQTYP/ACTTYP combinations will use the TN as a point of address validation, when the address does not validate. This enhancement is applicable to REQTYPs A (excluding XDSL, HDSL and UCL services) and E. It is applicable for Line Sharing and Line Splitting.		
		(RAO) as follows: Georgia, Mississippi, Louisiana and Florida. BellSouth will provide the roll out plan for Single C as soon as it is		
		ICTION ITEM: BellSouth CMT to investigate including internal changes e release package.		
	NEW A	ACTION ITEM: BellSouth to investigate if CAVE generated orders can be in CSOTS.		
	NEW A	CTION ITEM: BellSouth to provide the roll out plan for Single C as it is completed.		
3. Follow-up Review of Supp Validation of TN vs Address i Add'1 REQTYPs (CR0371)		of TN vs Address for Additional REQTYPs. This is associated with CR0371. The purpose of this enhancement is that certain REQTYP/ACTTYP combinations will use the TN as a point of address validation, when the address does not validate. This enhancement is applicable to REQTYPs A (excluding XDSL, HDSL and UCL services)		
		Requirements UR20074.00650200 establish the hierarchy for due date calculation.		
	NEW A For Add	CTION ITEM: BellSouth to reflect that Validation of TN vs. Address ditional REQTYPs excludes XDSL, HDSL and UCL services.		
	UCL, A	CTION ITEM: BellSouth to investigate the business rules for 10.3.1 for CTs of C, D and V where the End User Address fields are changing quired to optional.		
4. Review of Provide Cable/C Pair Status via Pre-Order (CR	han 0368)	The CLECs requested that we deviate from the agenda and review the user requirements for Release 10.5 next.		
User Requirements		Chris Allen (BST) led the review of the user requirements for CR0368 - Provide Cable/Chan Pair status via Pre-order. CLECs questioned why there were two updates/distributions of this document. BST replied that the updates were made to bold the fields that would be impacted by this feature and to remove two internal requirements that are under investigation. CLECs questioned why the "Revised" date was not changed. BST indicated this was an oversight and will be corrected with the next distribution.		
		Chris stated that the ability for users to electronically query BST systems to determine the status of Loop Inventory does not exist today. This pre-ordering feature would provide the capability to facilitate an electronic query, which will allow users to determine the status of specific Wire Center – CABLE ID/CHAN PAIR designations in their Loop Inventory. Also, when an indication is returned to the submitter that a CABLE ID/CHAN PAIR assignment is currently "working", the user will receive the specific BellSouth "Circuit ID" which is associated with the CABLE ID/CHAN PAIR designations.		



January 15, 2002

User Requirements Review-Releases 10.3.1, 10.4 & 10.5

		MEETING MINUTES
Agenda Items		Discussion
		CLECs questioned if charges would be associated with this feature. BST replied that at this time, no charges would apply.
		Mpower questioned if this change was associated with the switch report, as it appears this enhancement may provide the same information. BST CMT is not familiar with this report, but will investigate.
		Subsequent to the meeting, Chris Iscovelli (AT&T) questioned why 10 was selected for maximum number of cable/chan pair choices.
		CTION ITEM: BellSouth will change the "Revised Date" for the Provide Chan Pair Status via Pre-order Requirements document.
	"LENS"	CTION ITEM: The documentation sub-team will address utilizing and "TAG" in the user requirements documentation in lieu of "Web" and "Access Gateway".
		CTION ITEM: BellSouth CMT will investigate if the switch report s the same information as the provide table/clian pair pre-ordering ment.
	NEW A(maximu	CTION ITEM: BellSouth to provide information regarding the mumber of 10 for cable/chan pair choices.
		Alicia Warren (BST) led the review of the user requirements for Change Main Account Number on Directory Listings only – CR0365. This feature will allow the user to issue a single LSR to change the main account number for a "Directory Listing Only" account with a LNPBL/LNPRL class of service. This feature is applicable to Directory Listings Only (REQTYP), Activity Type of R (Record Activity).
		Chris Iacovelli (AT&T) questioned a business rule that states that the LTN must match the ATN, BST will investigate.
		CTION ITEM: BellSouth to investigate the business rule that states that must match the ATN.
		Brenda Honore (BST) led the review of the user requirements for the



Brenda Honore (BST) led the review of the user requirements for the electronic ordering of ERLS (Rnhanced Extended Links). This feature will allow requests for ERLS to be submitted electronically. Orders will be routed to the LCSC for manual handling. The system will accept a request for EELS when the SPEC field is populated with specific data.

Tom Hyde (Cbeyond) suggested that the language of requirement UR10119.0060 be re-worded regarding availability of EELS. Tom also indicated that the matrix in requirement UR10119.0160 needed to be corrected for some of the NC and SECNI codes. He also questioned it this functionality would include local channels and non-witched combinations (UNCN3 and UNCIL). Rita Knapp (HST) advised that these are not included with this requirements document, but that a separate requirement is being developed to include these two items.

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January 15, 2002 User Requirements Review-Releases 10.3.1, 10.4 & 10.5

Agenda Items	Discussion			
	NEW ACTION ITEM: BellSouth to revise the EELS user requirement documentation to reflect updated business rules, corrections to matrix and removing Nashville from the MSA list.			
	NEW ACTION ITEM: BellSouth to investigate how LNA is defined for designed loops (associated with user requirement UR10119.0030).			
	NEW ACTION ITEM: BellSouth to ensure work instructions are provided to the LCSC for the handling of EELS orders submitted electronically.			
	Discussion took place regarding the Documentation Sub-Committee that was formed at a December CCP meeting. At the December 18, 2001 meeting, CLECs requested that a Sub-Committee be formed to address all documentation to discuss improvements and to ensure expectations are met. This would include the user requirements, business rules, EDI specifications and TAG API Reference Guide. Two CLECs (WorldCom and Nightfire), volunteered to participate. We are targeting scheduling the first Documentation Sub-Committee early February. Sub-Committees are open to all CLECs.			
	Due to the time, we were not able to complete the review of the user requirements for Releases 10.5, 10.4 and 10.3.1. A follow-up meeting will be scheduled for the week of 1/22/02 to complete the review.			
	ACTION ITEM: BellSouth CMT to investigate including internal changes with the release package.			
	Status to be provided during 1/23/02 meeting.			
	ACTION ITEM: BellSouth to investigate if CAVE generated orders can be viewed in CSOTS.			
	Status to be provided during 1/23/02 meeting.			
	ACTION ITEM: BellSouth to provide the roll out plan for Single C as soon as it is completed.			
	Status to be provided during 1/23/02 meeting.			
	ACTION ITEM: BellSouth to reflect that TN vs. Address for Additional REQTYPs excludes XDSL, HDSL and UCL services.			
	Status to be provided during 1/23/02 meeting.			
	ACTION ITEM: BellSouth to investigate the business rules for 10.3.1 for UCL, ACTs of C, D and V where the End User Address fields are changing from required to optional.			
	Status: TN vs. Address for Additional REQTYPs excludes UCL services. The 10.3.1 business rules will be updated accordingly.			
	ACTION ITEM: BellSouth will change the "Revised Date" for the Provide Cable/Chan Pair Status via Pre-order Requirements document.			
	Status to be provided during 1/23/02 meeting,			

January 15, 2002 User Requirements Review-Releases 10.3.1, 10.4 & 10.5 MEETING MINUTES

Agenda Hems

Discussion

ACTION ITEM: The documentation sub-team will address utilizing "LENS" and "TAG" in the user requirements documentation in lieu of "Web Interface" and "Access Gateway".

Status: Documentation Sub-Team to meet early February (targeting).

ACTION ITEM: BellSouth CMT will investigate if the switch report provides the same information as the cable/chan pair pre-ordering enhancement.

Status to be provided during 1/23/02 meeting.

ACTION ITEM: BellSouth to provide information regarding the maximum number of 10 for cable/chan pair choices.

Status: For the enhancement to provide cable/chan pair status via preordering functionality, the number of 10 cable/chan pair choices was selected because it was thought 10 would be a reasonable number from the user's perspective. 10 cable/chan pair choices allows us to achieve balance while allowing the user flexibility and efficient use of BST internal systems.

ACTION ITEM: BellSouth to investigate the business rule that states the LTN must match the ATN.

Status: The LTN field is automatically updated with the new main account number when the RTY 2^{-1} and 3^{-1} character = ML.

ACTION ITEM: BellSouth to revise the EELS user requirement documentation to reflect updated business rules, corrections to matrix and removing Nashville from the MSA list.

Status: Updated User Requirements for the Electronic Ordering of EELS provided to the CLEC community on 1-22-02.

ACTION ITEM: BellSouth to investigate how LNA is defined for designed loops (associated with user requirement UR10119.0030).

Status: Updated User Requirements for the Electronic Ordering of EELS includes an update to UR10119.0030.

ACTION ITEM: BellSouth to ensure work instructions are provided to the LCSC for the handling of EELS orders submitted electronically.

Status: The LCSC will be provided with the appropriate work instructions prior to the release for the handling of EELS orders that are submitted electronically.

SINGLEC

A High Level Overview

Single C

Project Scope:

issuance (by BellSouth) of a single order (Change Order). Today, two orders (New and Disconnect Orders) are required to execute the local Single C is an effort within BellSouth to process the a local service request (from a CLEC) to convert an account to UNE-P via the service request.

Conversion scenarios to be included:
Resale to UNE-P (Same or different CLEC)
Retail to UNE-P (BST to CLEC)
UNE-P to UNE-P (CLEC to CLEC)

Account types planned:
Residence
Non-Complex Business

Single C

Benefit:

Eliminates need for two internal BellSouth orders and associated coordination

Impacts:

- LSR inputs or processing by CLECs no change
- BellSouth internal ordering/billing processes changes are required

Project Status:

Targeted for implementation during 2nd Quarter 2002

EXHIBIT 6

CONFIDENTIAL Subject to Protective Order



Electronic Interface Test Agreement

With

AT&T

Prepared by:

BellSouth Telecommunications, Inc.

27M40 675 West Peachtree St. NE Atlanta, GA 30375



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Table of Contents

Change History		*******************		
About This Document		*********************	************	
Audience	******************************	*************************	********************	
Purpose	*********************	**********************	******************************	
Purpose Rules of Testing		****************************	*****************	4
Testing Assistance	***************************************	***********************	********	
Test Scenarios and Test Cases) }		
Contacts			***********	4
Testing Details	******************************		· · · · · · · · · · · · · · · · · · ·	4
Test Phases	•	******************************	******************	
Special Agreements:				
Signatures				

Change History

04/26/01	1.1	Changed Date table to identify applicable electronic interface(s)
07/11/01	2.0	Changed Version number
07/11/01	2.0	Corrected Table of Contents
07/11/01	2.0	In Test Scenarios and Test Cases section added PVT to last bullet
07/11/01	2.0	In Contacts section added EDI Central Test Manager
07/11/01	2.0	In Testing Details section added specific transaction / product types
07/11/01	2.0	Reformatted Test Phases table to better identify Application Connectivity tests
07/11/01	2.0	Added section for Conference Call Dates and Times
10/15/01	3.0	Remove Date and Year from cover page
10/15/01	3.0	Update Testing Details to agree with survey
10/15/01	3.0	Update Test Phase Section
10/15/01	3.0	Add Data Transformation group to Signature Page
10/15/01	3.0	Modify Contact Title to agree with signature page



About This Document

Audience

The BellSouth Electronic Interface Testing Agreement is intended for Competitive Local

Exchange Carriers who order local exchange products and services from BellSouth Telecommunications, Inc. via electronic interfaces

Electronic Data Interchange (EDI) or Telecommunications Access Gateway (TAG). It is also for software vendors, who develop
software products or platforms for ordering local exchange products and services from BellSouth Telecommunications, Inc

Purpose

The purpose of this document is to establish a testing agreement between the CLEC/Vendor and BellSouth.

Rules of Testing

- Execution of this agreement assumes all terms, conditions, and guidelines set forth in the BellSouth Electronic Interface Testing Guidelines document.
- 2. Any changes or special arrangements must be noted in the "Special Arrangements" section of this document.
- 3. All parameters set forth in this document must be followed or the user may risk suspension from testing.
- 4. If a CLEC requests suspension of testing, then all new dates must be re-negotiated.
- 5. BellSouth and/or the CLEC/Vendor reserves the right to suspend testing with no less than three (3) days notice for failure to meet all entrance criteria defined in the Electronic Interface Testing Guidelines document, agreed time frames, major coding changes, requirements, connectivity failures, or in the best judgment of the business.
- 6. If additional time is needed to complete testing, an addendum with new dates must be negotiated.
- 7. If any dates are missed such that they impact the next phase of testing, then new dates must be negotiated.
- 8. In order for testing to begin, this document must be complete, with all signatures.
- 9. Should contact personnel or roles and responsibilities change, this document should be updated.

Testing Assistance

Throughout your implementation you may contact the CLEC Help Desk for technical assistance. For business related questions during your implementation contact your Implementation Manager. During testing you may contact the Test Desk for business rule questions.

Test Scenarios and Test Cases

- CLEC/Vendor provides a list of scenarios.
- BST uses test cases to verify the CLECs ability to place local service requests and send acknowledgments for products and services via the EDI and TAG electronic interfaces
- BellSouth's CLEC Help Desk and Test Desk will provide the actual test cases to the CLEC/Vendor prior to the beginning of the testing phase
- During phases other than CAVE, CLECs may be required to use their own accounts to test certain activities
 - CLEC will provide live data and accounts for PVT and SRT



Contacts

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Data Transformation Group	Venkatesan Subramanian	205 403- 2476		Venkatesan.Subramanian

THE P	3 14 15 15 15 15 15 15 15 15 15 15 15 15 15		
Project Manager	Rich Bobick	404 810- 2311	bobik@att.com



Testing Details

Interface Type	TAG	EDI
Connectivity Type	X	X
TCIF Issue	9	9
TAG API Release	7.8.1.2	

Pre-order Scenarios to be tested during agreement period:

☐ Address Validation
☐ Address Validation Query By Telephone Number
☐ Address Validation Query By Address
☐ TN Reservation
☐ Telephone Number Selection Query for General Pool
☐ Telephone Number Cancellation Query
☐ TN Reserve
☐ Parsed CSR
☐ Due Date Calculation

Directory	Test Case #
Scenario #1 * (Act= N) Type of Account: Business Establish stand-alone business listing account - LACT=N	
Scenario #2 * (Act= N) Type of Account: Business Establish stand-alone business listing account, omit listed address (ADI=Y) - ACT=N Send 3 sets of directories to customer address (DACT = N)	
Scenario #3 * (Act= D) Type of Account: Business Disconnect stand-alone directory listing account for business listing.	
Scenario #4 * (Act= R) Type of Account: Residence Add additional listing to existing residential account - LACT=N	
Scenario 5 * (Act= R) Type of Account: Residence Change listing on existing Small Business account from non-published to published	
Port Loop Combo	
Scenario #6 * (Act= N) Type of Account: Business / Single Line New install with features, blocking codes (BA/BLOCK) - LNA=N	
Scenario #7 * (Act= N) Type of Account: Business / Multi-Line New install of multiple lines, with features, and series completion hunting	
Scenario #8 * (Act= C) Type of Account: Business / Single Line Change to add and remove features, modify feature detail of existing features – LNA=C	
Scenario #9 * (Act= C) Type of Account: Business / Multi-Line Change to add additional line to account with features - LNA=N; Also, change listing from non-published to listed (LACT O&I).	
Scenario #10 * (Act= D) Type of Account: Business / Single Line Complete disconnect of account - LNA=N/A	
Scenario #11 * (Act= V) Type of Account: Business / Single Line Conversion adding and removing features on existing line - LNA=V; Modify existing listing (LACT O&I	
Scenario #12 * (Act= V) Type of Account: Business / Multi-Line	

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Conversion adding and removing features on multiple existing lines - LNA=V; Retain listing as-is (ERY=Y)	
Scenario #13 * (Act= D) Type of Account: Residence / Multi-Line Partial disconnect of a WTN (Secondary line)account (Test Case #: GA.PD9.0E)	
Scenario #14 * (Act= C) Type of Account: Residence / Single Line Change Order to Change TN. (Test Case # : GA.CTN.11.0E).	
Scenario #15 * (Act= N) Type of Account: Residence / Single Line New install of additional line (ADL) with jack request, features, access remarks, and additional listing - LNA=N, FL	
Scenario #16 * (Act= C) Type of Account: Residence / Single Line Change to add features and modify feature detail of existing features - LNA=C, FL	
Scenario #17 * (Act= D) Type of Account: Residence / Single Line Complete disconnect of account - LNA=N/A, FL	
Scenario #18 * (Act= T) Type of Account: Residence / Single Line Transfer (Move) service of line with features and access remarks - LNA=N, FL	
Scenario #19 * (Act= V) Type of Account: Residence / Multi-Line Conversion removing and adding features, adding blocks (BA/BLOCK) - LNA= V G Retain listings as-is (ERL=Y)	
Scenario #20 * UNE-P Change (ReqType=M, Act=C, LNA=C) single Line Residence Change PIC and LPIC only (say from 0288 to 0000) and also change Directory Listing from Published to Non Published, FL.	
Scenario #21 * UNE-P – Migrate (Partial) (ReqType=M, Act=P, LNA=G) Multi Line Residence Migrate only the 2 nd Line of a Multi Line Account (becomes ATT single line account), FL	
Scenario #22 * UNE-P - Change TN (ReqType=M, Act=C, LNA=X) Single Line Residence Transfer of Calls Std w/o Number, No Change in Features, etc , FL	
Scenario #23 *Sup to Change Due Date (REQTYPM; ACT T) (Single Line Accounts), GA	
Scenario #24 *Sup to Change Due Date, FL	
Scenario #25 *Sup to Cancel LSR, FL	
Line SPLIT	
Scenario #26 * New (Act= N) Install one (1) existing retail single line account to Line Splitting - LNA=N	
Scenario #27 * New (Act= C) Conversion of one (1) existing retail single line account to Line Splitting - LNA=N	and the second second
Scenario #28 * (Act =D) Disconnect Line Splitting from single line retail account - NA=D	
Total Number of Non-LNP Test Scenarios	28



Test Phases

TRANSPICATION TO THE		
	September 9, 2002	September 9, 2002
None (Ont Hith State	September 10, 2002	September 17, 2002

Runetion#E	September 23, 2002	October 11, 2002

Conference Call Dates and Times: As Needed

Special Agreements: Special Agreements: Pre-Order testing will be conducted in the CAVE environment.

Signatures
Signed:

	Date	
AT&T Project Manager Rick Bobick		
	Date	
BST Test Desk Manager Tammy Higgins		
	Date	
BST CLEC Heip Desk Sylvia Shuler		
	Date	
Data Transformation Group Venkatesan Subramanian		
	Date	
BST Implementation Rep Robert Parker		



Electronic Interface Test Agreement

With

AT&T CONSUMER

Prepared by:

BellSouth Telecommunications, Inc.

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Table of Contents

Change History			3
About This Document	***************************************		4
Audience			
Purpose			
Rules of Testing	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		4
Testing Assistance			4
Test Scenarios and Test Cases			4
Contacts	120020000000000000000000000000000000000		5
Testing Details			
Test Phases			
Special Agreements:		***************************************	8
Signatures			9

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THE TOWN		
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- BellSouth's CLEC Help Desk and Test Desk will provide the actual test cases to the CLEC/Vendor prior to the beginning of the testing phase
- During phases other than CAVE, CLECs may be required to use their own accounts to test certain activities
- CLEC will provide live data and accounts for PVT and SRT



Contacts

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Project	Bernadette Seigler	404 810-	BSeigler@ATT.Com
Manager		8956	



Testing Details

Interface Type	TAG	EDI
Connectivity Type	X	X
TCIF Issue	9	9
TAG API Release	7.8.1.2	

Directory	Test Case #
Scenario #1 * (Act= N) Type of Account: ResidenceEstablish stand-alone residence listing account with additional listing - LACT=	
Scenario #2 * (Act= D) Type of Account: Residence Disconnect stand-alone directory listing account for residence listing.	
Scenario #3 * (Act= R) Type of Account: ResidenceChange listing on existing residential ccount from non-published to published - LACT=O&IRemove additional listing – LACT=D	
Port Loop Combo	
Scenario # 4 * (Act= N) Type of Account: Residence / Single Line New install of additional line (ADL) with jack request, features, access remarks, and additional listing - LNA=N	
Scenario # 5 * (Act= T) Type of Account: Residence / Single Line Transfer (Move) service of line with features and access remarks - LNA=N	
Scenario #6 * (Act= V) Type of Account: Residence / Single Line Conversion adding and removing features on existing line - LNA=V; Modify existing listing (LACT O&I)	
Scenario #7 * (Act= V) Type of Account: Residence / Single Line Conversion with features (BA/BLOCK) - LNA=G; Retain listing as-is (ERL=Y)	
Scenario #8 * (Act= D) Type of Account: Residence / Multi-Line Partial disconnect of a WTN (Secondary line)account	
Scenario #9 * (Act= C) Type of Account: Residence / Single Line Change Order to Change TN and also add Features.	
Scenario #10 * (Act= N) Type of Account: Residence / Single Line New install of additional line (ADL) with jack request, features, access remarks, and additional listing – LNA=N, FL	
Scenario #11 * (Act= N) Type of Account: Residence / Multi-Line New install of multiple lines with features, blocking codes (BA/BLOCK), and designer bold listing – LNA=N, FL	
Scenario #12 * (Act= N) Type of Account: Residence / Single Line New install with ten features, including two RingMaster® service numbers - LNA=N. Order also includes two additional main listings for the RingMaster® service numbers., FL	
Scenario #13 * (Act= C) Type of Account: Residence / Single Line Change to add features and	

(a) BELLSOUTH

modify feature detail of existing features - LNA=C, FL	
Scenario #14 * (Act= C) Type of Account: Residence / Single Line Change to remove features and add blocking (BA/BLOCK) - LNA=C, FL	
Scenario #15 * (Act= D) Type of Account: Residence / Single Line Complete disconnect of account - LNA=N/A, FL	
Scenario #16 * (Act= D) Type of Account: Residence / Single Line Complete disconnect of account with transfer of calls - LNA=N/A, FL	
Scenario #17 * (Act= T) Type of Account: Residence / Single Line Transfer (Move) service of line with features and access remarks - LNA=N, FL	
Scenario #18 * (Act= V) Type of Account: Residence / Multi-Line Conversion removing and adding features, adding blocks (BA/BLOCK) - LNA= G Retain listings as-is (ERL=Y), FL	
Scenario #19 * (Act= V) Type of Account: Residence / Single Line Conversion with features (BA/BLOCK) - LNA=G; Retain listing as-is (ERL=Y), FL	
Scenario #20 *UNE-P Change (ReqType=M, Act=C, LNA=C) Single Line Residence Change PIC and LPIC only (say from 0288 to 0000), FL	
Scenario #21 *UNE-P Partial Disconnect (ReqType=M, Act=C, LNA=D) Multi Line Residence Disconnect only the Secondary Line of a Multi Line Account with transfer of calls, FL	
* UNE-P - Move (ReqType=M, Act = T, LNA=N) Single Line Residence Delete And Add Features Directory Listing Change from Non-Pub to Std, Change PIC/LPIC from 0000 to 0288 and add Additional Listing	
Scenario #23* UNE-P – Migrate (Partial) (ReqType=M, Act=P, LNA=G Multi Line Residence Migrate only the 2 nd Line of a Multi Line Account (becomes ATT single line account),FL	
Scenario #24* UNE-P – Migrate (Partial) (ReqType=M, Act=P, LNA=G) Multi Line Residence Multi Line Order - Migrate the 3 rd and 2 nd Line of a Multi Line Account (becomes ATT multi line account) FL	
Scenario#25* UNE-P – Migrate (ReqType=M, Act=V, LNA=G) Multi Line residence Multi Line Order-, Ist Line as migrate single line, 2nd Line as new install single line(becomes ATT multi line acct,FL	
Scenario #26 * UNE-P - Change TN (ReqType=M, Act=C, LNA=X) Single Line Residence Transfer of Calls Std w/o Number, No Change in Features, etc. FL	
Scenario #27* UNE-P - Change TN (ReqType=M, Act=C, LNA~X)Single Line Residence Transfer of Calls Std with Number, Change Dir Listing from Non-Pub to Std and Add additional Listings, FL	
Scenario #28*UNE-P - Change TN (ReqType=M, Act=C, LNA=X) Multi Line Residence Change TN of the Main Line of a Multi Line Account, Change Dir Listing from Standard to Non-Published	
Scenario #29* UNE-P - Change TN (ReqType=M, Act=C, LNA=X) Multi Line Residence Change TN of the Secondary Line of a Multi Line Account, No Change to the Non Listed Dir Listing	
Line Split	
Scenario #30 * New (Act= V) Install one (1) existing retail single line account to Line Splitting - LNA=N	
Total Number of Non-LNP Test Scenarios	30



Test Phases

Avidie Vorkeining (Vores blocking)	July 29, 2002	July 31, 2002
	August 1, 2002	August 23, 2002

	SAME BOOK TO SEE	
	July 29, 2002	July 31, 2002
Putetional	August 12, 2002	September 6, 2002

Conference Call Dates and Times: As needed

Special Agreements: Pre-Order testing will be conducted in the CAVE environment. BellSouth and AT&T agree during TAG testing only, if one phase of testing end early the next phase of testing will begin.



Signatures
Signed:

	Date	
AT&T Consumer Project Manager Bernadette Seigler		
	Date	
BST Test Desk Manager Tammy Higgins		
	Date	
BST CLEC Help Desk Sylvia Shuler		
	Date	
Data Transformation Group Marilyn Rimel	Date	
BST Implementation Rep Robert Parker		

EXHIBIT 7

CONFIDENTIALSubject to Protective Order

On August 20, 2002, in the CAVE testing environment, AT&T issued a Local Service Request for a UNE-P Partial Migration Order *** (PON #CLECCNATT23)***\frac{1}{2}. This Local Service Request contains two separate and distinct orders, a 'N' Order and a 'C' Order. This Local Service Request contains documented proof that the AT&T knew that the Single "C" functionality did not include Partial Migration.

¹ See the attached LSR: PON#***CLECCNATT23***. This LSR was pulled from the BellSouth LEO Audit System.

A8D LOCAL SERVICE REQUEST (BROW)

BROUSE SCREEN

JUMP TO:

X STAT DDD TN ORD DD DTSENT CUID STATUS DATE CC

TOS

PON

TOTAL TOTAL PROPERTY OF THE PR

VER

ICIE

PF1=>MAIN MENU PF2=>PON PF3=>ERROR PF4=>NOTES PF5=>NUDIT PF8=>JUMP PF22=>FWD PAGE PF23->BKWD PAGE

A8D LEO AUDIT SYSTEM - BROWSE SCREEN (AUD)

RESH/CC:

PON:

VER:

SUP:

JUMP TO:

DUE DATE:

LSRNO:

AN:

ATN:

TCIF: THIS LSR:

MEXT LSR:

DATE

TIME

TYPE HISTORY LINE

ERRNO

XREF

PF5=>BROWSE LIST PF7=>RESUBMIT CA/MISSING PF8=>JUMP PF10=>RESUBMIT PS0 PF22=>FWD PAGE PF23=>BKWD PAGE PF9=>CLAIM



Extensioner state extension tile

A8D LEO AUDIT SYSTEM - BROWSE SCREEN (AUD)

RESH/CC:

PON:

UFR:

SUP:

JUMP 10:

DUE DATE:

LSRNO:

ATN:

TYPE HISTORY LINE

TCIF: THIS LSR:

NEXT LSR:

DATE **ERRNO**

AN:

TIME **XREF**

PF5=>BROWSE LIST PF7=>RESUBMIT CA/MISSING PF8=>JUMP

PF9=>CLAIM

PF10=>RESUBMIT PS0

PF22=>FWD PAGE

PF23=>BKWD PAGE

















A8D LEO AUDIT SYSTEM - BROWSE SCREEN (AUD)

TYPE HISTORY LINE

RESH/CC:

PON:

UER:

SUP:

JUMP TO:

DUE DATE:

LSRNO:

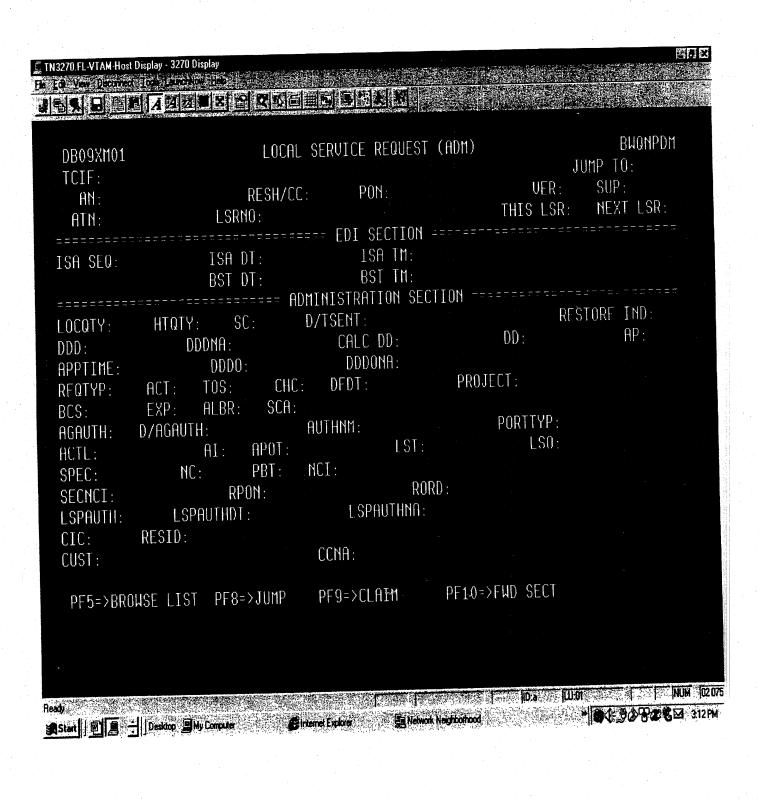
ATN: AN:

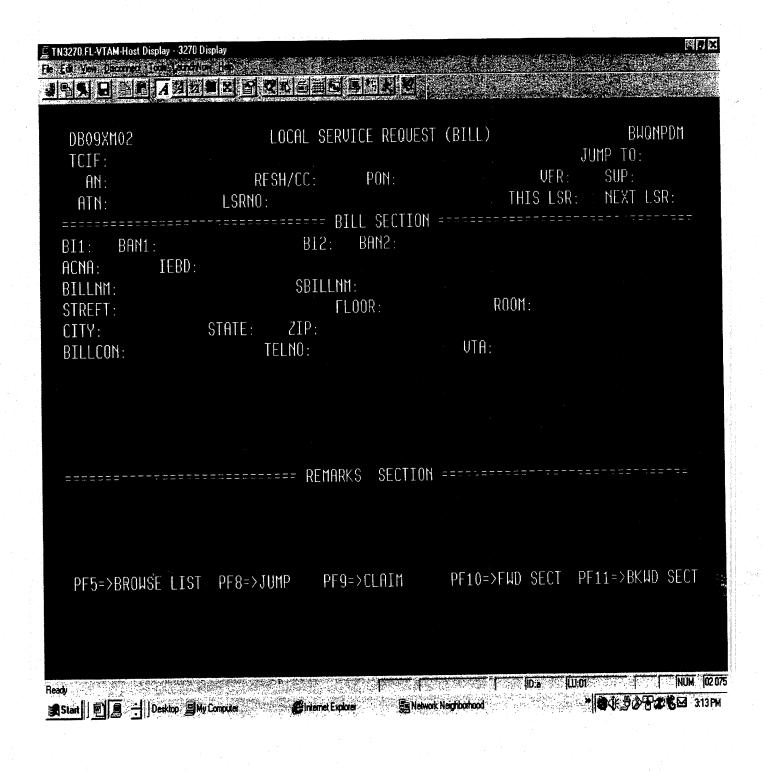
TCIF: THIS LSR:

MEXT LSR:

DATE ERRNO TIME XREF

PF5=>BROWSE LIST PF7=>RESUBMIT CA/MISSING PF8=>JUMP PF9=>CLAIM PF10=>RESUBMIT PS0 PF22=>FWD PAGE PF23=>BKWD PAGE





P0N:

367. 口間的 4 四回自己 2 2 2 日间马克达生 2 3 3 3 3

PORT/LOOP COMBO

BUQNPDM

TCIF: AN:

RESH/CC:

UER:

SUP:

JUMP TO:

ATN:

LSRNO:

THIS LSR:

MEXT LSR:

======= SERVICE SECTION FA: USOC: FEATURE DETAIL:

SOFC: FEATURE TAG:

TCOPT:

PF5=>BROWSE LIST =>PF8=>JUMP PF9=>CLAIM PF10=>FWD SECT PF11=>BKWD SECT

PF22=>FWD PAGE PF23=>BKWD PAGE



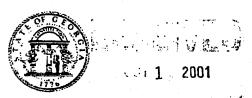




EXHIBIT 8

COMMISSIONERS:

LAUREN "BUBBA" McDONALD, JR., CHAIRMAN ROBERT B. BAKER, JR. DAVID L. BURGESS BOB DURDEN STAN WISE



DEBORAH K. FLANNAGAN EXECUTIVE DIRECTOR

LALUUINE DEUREIMAY

REECE MCALISTER CUTIVE SECRETARY

Georgia Public Service Commission

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FAX: (404) 656-2341 www.psc.etate.gs.us

OCT 2 3 2001

DOCKET#_6863

GENERAL COUNSEL-**GEORGIA**

Docket No. 6863 DCUMENT# 50945

In Re:

Consideration of BellSouth Telecommunications, Inc's Entry Into InterLata

Services Pursuant to Section 271 of the Telecommunications Act of 1996

Docket No. 7253-U

of

In Re:

BellSouth Telecommunications, Inc.'s Re

the

252(f) and Conditions Section Available under

Telecommunications Act of 1996

In Re:

Investigation into Development of Elec

Operational Support Systems

ORDER

BY THE COMMISSION:

On May 1, 2001, the Georgia Public Service Commission ("Commission") voted to adopt a Procedural and Scheduling Order ("Scheduling Order") to initiate a review of BellSouth Telecommunications, Inc.'s ("BellSouth") compliance with section 271 of the Federal Telecommunications Act of 1996 ("Federal Act"). Pursuant to the Scheduling Order approved by the Commission, initial comments from interested parties were due to be filed with the Commission on June 30, 2001; and reply comments were due on July 16, 2001. In response to the Commission's directive, BellSouth and Competing Local Exchange Carriers (CLECs) submitted exhaustive comments.

After conducting an extensive review of the comments filed and the review standards established by the Federal Communications Commission (FCC), the Commission finds that BellSouth has met the competitive checklist set forth in section 271 of the Act. The Commission bases it's finding on the totality of the evidence submitted by the parties. Since the passage of the State Telecommunication and Competition Development Act of 1995 and the Federal Act,

> Docket Nos. 6863-U, 7253-U, 8354-U Page 1 of 3

the Commission has conducted numerous critically important proceedings concerning BellSouth's section 271 compliance open to participation by all interested parties. For example, the Commission has provided for third-party testing of BellSouth's operations support systems (OSS) offerings. In addition, the Commission has adopted a broad range of performance measures and standards and initiated a Performance Assurance Plan designed to create a financial incentive for both, pre-entry and post-entry compliance with section 271.

As a result of the Commission's directives, BellSouth has undertaken the necessary steps to open its local exchange market to competition in Georgia. The FCC has repeatedly stated in its previous Orders that the most probative evidence to demonstrate that local markets are irreversibly open is commercial usage. As of July 2001, CLECs served over 815,000 local lines in BellSouth's Georgia service area. This total includes over 715,000 facilities-based access lines. BellSouth is providing more than 261,000 interconnection trunks and 700 collocation nodes to CLECs. In addition BellSouth is providing more than 228,000 unbundled local loops, including more than 84,000 stand-alone unbundled local loops and more than 144,000 unbundled loops provided as part of an unbundled network element platform (UNE-P).

The resale market in Georgia is also active. BellSouth provides more than 100,000 resold local exchange lines, including 27,000 business lines and 73,000 residential lines. These results provide further evidence that BellSouth has made extensive efforts to open its local markets in compliance with the requirements of the Act.

The Commission finds that BellSouth has met Track A and the 14-point checklist items as prescribed by section 271 of the Federal Act. As part of Docket No. 7253-U, the Commission also approves BellSouth's Statement of Generally Available Terms and Conditions ("SGAT"). In the context of Docket No. 8354-U, the Commission adopts the Third-Party Test Final Report findings.

While the totality of the evidence supports a finding that BellSouth has met the requirements under section 271 of the Federal Act, the written comments and evidence submitted raised issues that warranted consideration. The Commission's finding that BellSouth has met the requirements does not mean that providing the proper incentives for continued improvements in BellSouth's performance is no longer a goal of this Commission. With that in mind, the Commission directs BellSouth to implement by January 5, 2002, a "C" order by which N and D orders complete together in sequence to prevent loss of dial tone. Further, the Commission orders BellSouth to implement by November 3, 2001, migration by Telephone Number and name. The Commission also orders BellSouth to implement fully fielded parsed CSRs by January 5, 2002. The Commission directs that BellSouth implement by January 5, 2002, electronic ordering for line splitting. Finally, the Commission orders that BellSouth increase the reject correction time limit from ten days to thirty days by November 3, 2001. For the OSS upgrades listed above, the Commission will assess penalties of \$10,000 per day for every day beyond the deadline in the implementation schedule that BellSouth has not complied with the ordered improvement.

WHEREFORE IT IS ORDERED, that the Commission finds that BellSouth has met Track A and the 14-point checklist items as prescribed by section 271 of the Federal Act.

ORDERED FURTHER, BellSouth's SGAT is hereby approved by the Commission.

ORDERED FURTHER, that the Third-Party Test Final Report findings are hereby adopted by the Commission.

ORDERED FURTHER, that BellSouth shall implement by January 5, 2002, a "C" order by which N and D orders complete together in sequence to prevent loss of dial tone.

ORDERED FURTHER, that BellSouth shall implement by November 3, 2001, migration by Telephone Number and name.

ORDERED FURTHER, that BellSouth shall implement fully fielded parsed CSRs by January 5, 2002.

ORDERED FURTHER, that BellSouth shall implement by January 5, 2002, electronic ordering for line splitting.

ORDERED FURTHER, that BellSouth shall increase the reject correction time limit from ten days to thirty days by November 3, 2001.

ORDERED FURTHER, that for the OSS upgrades listed above, the Commission will assess penalties on BellSouth of \$10,000 per day for every day beyond the deadline in the implementation schedule that BellSouth has not complied with the ordered improvement.

ORDERED FURTHER, that a motion for reconsideration, rehearing, or oral argument or any other motion shall not stay the effective date of this Order, unless otherwise ordered by the Commission.

ORDERED FURTHER, that jurisdiction over these matters is expressly retained for the purpose of entering such further Order or Orders as this Commission may deem just and proper.

The above by action of the Commission in Administrative Session on October 2, 2001.

Executive Secretary

Accent Mandolf Jr. Charen McDonald, Jr.

Chairman

10/19/01 Date

EXHIBIT 9

March 28, 2002

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Office of the Secretary
445-12th Street, S.W.
Washington, D.C. 20554

Re: Application of BellSouth Corporation for Authorization Under Section 271 of the Communications Act to Provide In-Region, InterLATA Service in the States of Georgia and Louisiana, CC Docket No. 02-35

Dear Acting Secretary Caton:

Enclosed and previously filed electronically at CC Docket No. 02-35, on behalf of the Louisiana Public Service Commission ("LSPC"), are its Reply Comments to BellSouth's Application to Provide InterLATA service in the State of Louisiana pursuant to 47 U.S.C. § 271 (d)(2)(B).

The LPSC's Comments recommends that the application of BellSouth Corporation for authorization under Section 271 of the Communications Act to provide in-region, interLATA service in the State of Louisiana be granted.

Should you have any questions, feel free to contact me.

Respectfully,

Lawrence C. St. Blanc Executive Secretary

xc: Service List LPSC Docket No. U-22252 (E)

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, DC 20554

In the Matter of

Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Georgia and Louisiana

CC Docket No. 02-35

REPLY COMMENTS OF THE LOUISIANA PUBLIC SERVICE COMMISSION

JACK A. "JAY" BLOSSMAN, JR. CHAIRMAN

DON L. OWEN VICE CHAIRMAN

IRMA MUSE DIXON COMMISSIONER

C. DALE SITTIG COMMISSIONER

JAMES M. FIELD COMMISSIONER

MARCH 28, 2002

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, DC 20554

In the Matter of

Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Georgia and Louisiana

CC Docket No. 02-35

REPLY COMMENTS OF THE LOUISIANA PUBLIC SERVICE COMMISSION

The Louisiana Public Service Commission submits the following reply comments in support of the application of BellSouth Telecommunications, Inc. ("BellSouth") to provide interLATA service in Louisiana. The Louisiana Commission incorporates by reference and reasserts all of its comments filed in CC Docket No. 01-277, including the Evaluation of the Louisiana Public Service Commission filed October 19, 2001 ("Evaluation"), the Reply Comments of the Louisiana Public Service Commission filed November 13, 2001, and the Comments filed in CC Docket No. 02-35 on March 6, 2002. The reply comments provided herein will address the Louisiana Commission's continuing efforts to promote competition in the local service market and respond to comments of other parties to this proceeding, including the March 21, 2002 recommendation issued by the Department of Justice. In addition, the Louisiana Commission will address specific issues raised by the staff of the Federal Communications Commission ("FCC") during conversations with the Louisiana

Reply Comments of the Louisiana Public Service Commission FCC CC Docket No. 02-35 Page 1 of 15 Commission, including loading factors, feature costs, winback activities, and issues concerning the Louisiana SEEMS plan.

1. Non-Discriminatory Access to OSS

In its November 6, 2001 Evaluation, the DOJ expressed concerns about the capabilities of Bellsouth's OSS, in particular (1) service order problems associated with the two order conversion process known as the "N" and "D" order process, (2) excessive and inaccurate handling of manual orders, (3) TN migration, (4) Interface availability and (5) performance data reliability. In its most recent Evaluation recommending approval of the re-filed application, the DOJ acknowledges the changes and improvements that have been made in BellSouth's OSS under the direction of the state commissions, and that final completion of the metrics audit under the auspices of those commissions will further improve the accuracy and reliability of BellSouth's performance data.

Changes to Facilitate Automated Handling of CLEC Orders

The DOJ acknowledged that important enhancements have been made to BellSouth's OSS to improve the automated handling of CLEC orders. See DOJ Georgia/Louisiana II Evaluation, at p. 7. This includes, for example, BellSouth's compliance with the Georgia Commission's order to implement telephone number migration ("TN migration") and electronic ordering capabilities for DSL competitors, as well as its implementation of the parsed CSR functionality in compliance with the Louisiana and Georgia commission orders. Pursuant to our LPSC Order dated February 21, 2002 in Docket No. U-22252-C, BellSouth filed an affidavit into the record on

February 3, 2002 stating that it has complied with the requirement to implement the fully parsed CSR functionality.¹

associated with the "N" and "D" conversion process by ordering BellSouth to implement a single order process no later than April 1, 2001. The Louisiana Commission was the first state commission to order BellSouth to implement the single-C order process, although the Georgia Commission subsequently ordered it to be implemented at an earlier date. We understand from a recent public filing at the Georgia Commission that, on March 23, 2002, BellSouth implemented Release 10.4, which included the single "C" order process. We anticipate that BellSouth will file the affidavit we have required to be filed on April 2, 2001 indicating that it has complied with our order in this regard.

The DOJ commends the recent improvements in BellSouth's OSS as "positive developments that should permit new entrants to operate more efficiently," and cites recent performance data that bears this out. See DOJ March 21, 2002 Evaluation, at p. 11 ("BellSouth's CLEC order reject rate has significantly improved since the Department's Georgia/Louisiana I Evaluation was filed, likely due to the introduction of TN migration..." and "[i]n particular, the reject rate for UNE-P platform orders has fallen

The LPSC's 271 order dated September 21, 2001 in Docket No. U-22252-E required among other things that the LPSC Staff create a measure for disconnects associated with the two-order conversion process in the on-going workshops in Docket No. U-22252-C, along with associated penalties. The LPSC created this measure and associated penalties in LPSC Order No. U-22252-C-2. Additionally, we found that AT&T's request for penalties to be imposed in the event this functionality was imperfectly implemented would be considered in our ongoing workshops. No party has filed comments in Docket No. U-22252-C complaining about BellSouth's implementation of the parsed CSR functionality, despite being given ample opportunity to do so. We do note that AT&T and MCI WorldCom have raised this issue in the February 8, 2002 informal collaborative sponsored by Commissioner Irma Dixon. See Action Item 86,LPSC Collaborative Workshop Action Plan, Revised 2/8/2002, attached hereto as Exhibit 3. Staff has requested and received additional information and, after reviewing that information, will determine whether or not formal action will be required in the workshops in Docket No. U-22252-C.

CERTIFICATE OF SERVICE

document was s	•	20, 2002, a copy of the foregoing record, via hand delivery, facsimile,
[] Hand Mail [] Facsimile [] Overnight [] Electronic		H. LaDon Baltimore, Esquire Farrar & Bates 211 Seventh Ave. N, # 320 Nashville, TN 37219-1823 don.baltimore@farrar-bates.com for Qwest (fka LCI), Intermedia, KMC Telecom III and V
[] Hand [] Mail [] Facsimile [] Overnight [] Electronic		Charles B. Welch, Esquire Farris, Mathews, et al. 618 Church Street, #300 Nashville, TN 37219 cwelch@farrismathews.com for Time Warner and New South
[] Hand		Henry Walker, Esquire Boult, Cummings, et al. P. O. Box 198062 Nashville, TN 37219-8062 hwalker@boultcummings.com for XO Communications, ICG, ACSI (e.spire), Brooks Fiber, SECCA and US LEC
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	7